

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE)

-and-)

EARTH INTELLIGENCE NETWORK)

Plaintiffs,)

v.)

JASON GOODMAN)

PATRICIA A. NEGRON)

-and-)

SUSAN A. LUTZKE a/k/a)

“QUEEN TUT”)

Defendants.)

Case No. 3:17-cv-601-MHL

**PLAINTIFFS DEMAND
TRIAL BY JURY**

AMENDED COMPLAINT [Proposed]

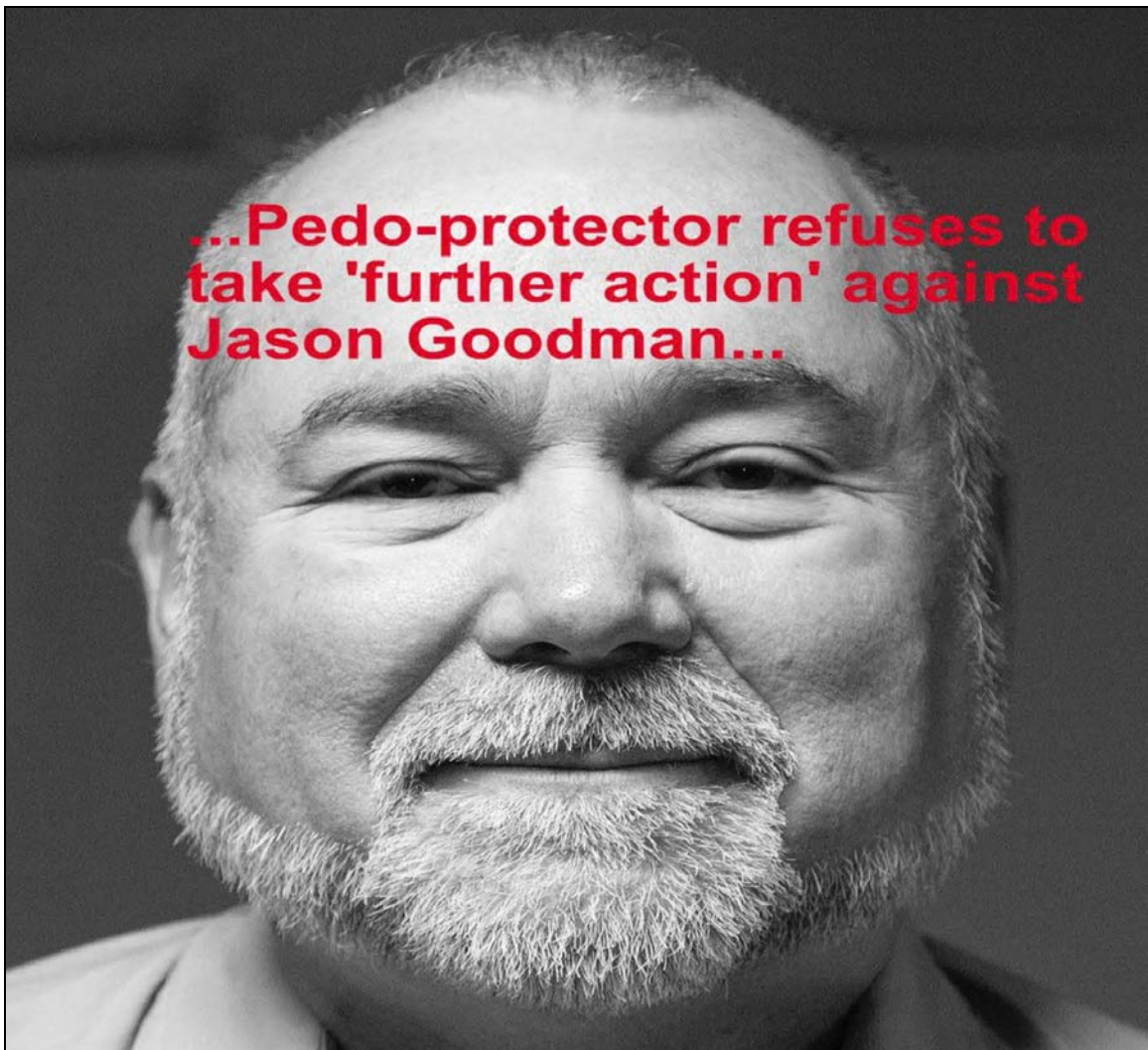
Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, file the following Amended Complaint against Defendants, Jason Goodman (“Goodman”), Patricia A. Negron (“Negron”) and Susan A. Lutzke a/k/a “Queen Tut” (“Lutzke”), jointly and severally.

Plaintiffs seek (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in an amount not less than **\$18,350,000.00**, (b) prejudgment interest on the principal sum awarded by the Jury from June 15, 2017 to the date of Judgment at the rate of six percent (6%) per year, (c) attorney’s fees pursuant

to § 18.2-152.12 and § 18.2-500 of the Virginia Code (1950), as amended (the “Code”), and (d) costs incurred – arising out of Defendants’ defamation *per se*, insulting words, business conspiracy, common-law conspiracy, tortious interference with contract and business expectancies, intentional infliction of emotional distress, personal trespass by computer and computer harassment, and unauthorized use of name and picture.

I. INTRODUCTION

The Defendants are social media predators. They use YouTube and Twitter almost every day to defame, insult, harass, and inflict injury upon Plaintiffs. Defendants’ recent tweets go so far as to accuse Robert David Steele of protecting pedophiles:

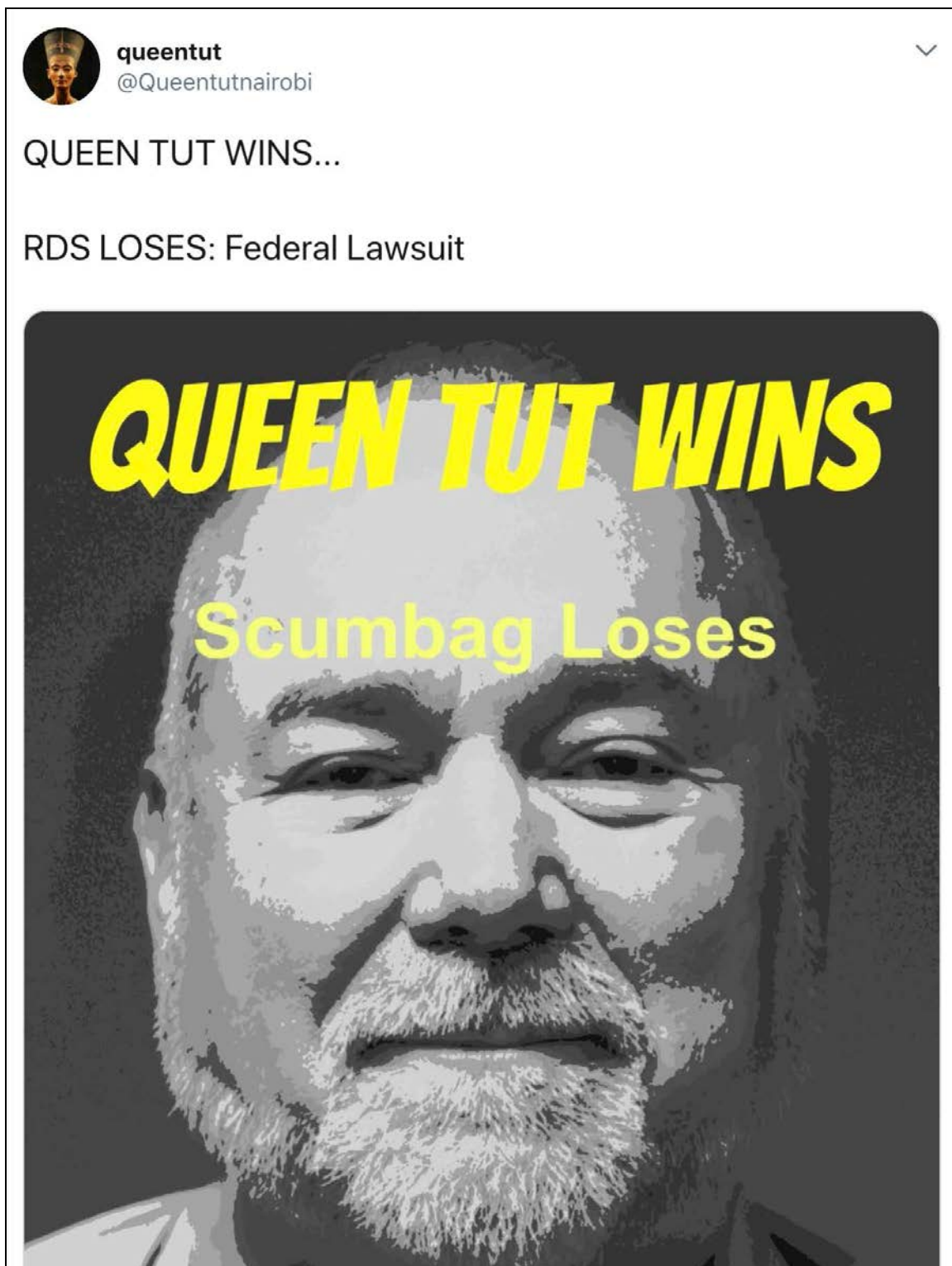




Defendants exhibit nothing but scorn for the Plaintiffs and the legal system. They call this action a “fakelawsuit”. They actively litigate the case online in videos, even soliciting commentary from lawyers unfamiliar with the matter. [See, e.g., <https://www.youtube.com/watch?v=8xCq0bMF0HI> (Interview with Elizabeth Lee Beck at 13:27)]. Letters are delivered to the Court [*Documents 31 and 33*] that are plainly false and intended to mislead. Still hiding behind an effigy that she calls “Queen Tut”,¹ Lutzke publicly ridicules the administration of justice and deliberately misrepresents the record in this case:



¹ The effigy is actually that of Queen Nefertiti. Neferneferuaten (Nefertiti) (c. 1370 – c. 1330 BC) was an Egyptian Queen and the Great Royal Wife (chief consort) of Akhenaten, an Egyptian Pharaoh. Nefertiti and her husband were known for a religious revolution, in which they worshiped one god only, Aten-Ra, or the sun disc. With her husband, she reigned at what was arguably the wealthiest period of Ancient Egyptian history. [<https://www.biography.com/people/nefertiti-9421166>].



The Defendants' egregious disrespect for the law is eclipsed only by their actual malice and desire to injure the Plaintiffs.

This case presents a new age of defamation and a unique breed of lawless and malicious conduct.

II. PARTIES

1. Plaintiff, Robert David Steele (“Robert”), is a citizen of Virginia. Robert is 65 years-old. Robert received a B.A. in political science from Muhlenberg College in 1974 and an M.A. in international relations from Lehigh University in 1976. From 1975 to 1979, he served in the United States Marine Corps as an officer variously assigned to infantry, intelligence and security/personnel duties in Asia and the United States. Following his service as a Marine, Robert remained in the Marine Forces Reserve until 1996 as an adjunct faculty member at Marine Corps University and developer of the Marine Corps Master Intelligence Plan, ultimately attaining the rank of Major. In 1979, he joined the Central Intelligence Agency (“CIA”) as an operations officer. As a CIA operation officer, Robert obtained a Top-Secret Security Clearance. During three tours overseas, focused on extremist and terrorist targets in Latin America, Robert managed over 100 clandestine assets. Hand-picked to pioneer advanced information technology for the CIA, Robert was a member of the Advanced Information Processing & Analysis Steering Group and the Advanced Program & Evaluation Group. In 1987, he received a second master’s degree in Public Administration from the University of Oklahoma, where he completed a thesis on strategic and tactical national security information management and was elected to Pi Alpha Alpha. In 1990, Robert received a Professional Certificate in Defense Studies from the Naval War College. Robert resigned from the CIA in 1988 to accept an invitation from the Marine Corps to establish the Marine Corps Intelligence Center as a GM-14 civil servant, where he remained until 1993. In 1993,

Robert formed Open Source Solutions, Inc., a pioneering open source intelligence (“OSINT”) firm. OSINT is a term used to refer to data collected from publicly available sources to be used in an intelligence context. In the intelligence community, the term “open” refers to overt, publicly available sources (as opposed to covert or clandestine sources). Robert was Chief Executive Officer of Open Source. For over twenty (20) years, Robert has dedicated himself to teaching individuals and organizations about the value of holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE). Robert’s education, experience, and publications, awards and recognitions are catalogued on his websites, <http://robertdavidsteele.com/> and <https://phibetaiota.net/>. Robert’s work has been universally commended. Lieutenant General Patrick Hughes praised Robert as follows:



Pat Hughes

Robert Steele deserves our admiration and our focused attention for bringing the idea of open source information to the fore. His passion to serve the nation by developing this new approach...is exemplary.

Lieutenant General Patrick Hughes, U.S. Army (Retired)
Former Director, Defense Intelligence Agency

Major General Pierre Lacoste described Robert as follows:



Pierre Lacoste

Constantly committed to truth and honesty, [his work] demonstrates his ability to grasp the real issues and to take into account the views and concerns of men of good will from all nations and all cultures.

Admiral Pierre Lacoste, French Navy (Ret),
Former Director of Foreign Intelligence (DSGE)

In January 2017, because of his leadership in redirecting the craft of intelligence away from spies and secrecy enabling war and waste towards open sources and methods favorable to peace and prosperity, Robert was nominated for a Nobel Peace Prize. The full text and active links to the nomination were published at the request of Jan Helge Havlik (“Havlik”), Editor-in-Chief of *Defence and Intelligence Norway* and are/were available online. [<https://phibetaiota.net/2017/01/nomination-for-the-nobel-peace-prize-robert-david-steele/>].² Until publication and republication of the Defendants’ videos, emails, tweets, blogs and other statements at issue in this action, Robert enjoyed an untarnished reputation.

2. Robert is especially proud of the *NATO Open Source Intelligence Handbook*, published in 2001. Robert wrote over 85% of the Handbook. The publication provides preliminary joint and coalition training information on the subject of OSINT. It discusses the fundamentals of OSINT support to both the all-source intelligence process, and to the unclassified intelligence requirements of operators, logisticians, and civilian organizations participating in joint and coalition operations. In a preface to the Handbook, General W. F. Kernan, General, U.S. Army, acknowledged that the publication “has benefited greatly from the continued collaboration between my staff and the staff of Open Source Solutions Inc. [*i.e., Robert David Steele*]”. [<https://phibetaiota.net/wp-content/uploads/2009/07/NATO-OSINT-Handbook1.pdf>].

3. In addition to his continuing work in OSINT, Robert is Chief Counsel and a Senior Commissioner to the Judicial Commission of Inquiry Into Human Trafficking and Child Sex Abuse of the International Tribunal of Natural Justice (“ITNJ”), Sir John

² Defendants knew that Robert had been nominated for a Nobel Peace Prize. Their statements to the contrary were knowingly false.

Walsh of Brannagh presiding. ITNJ Commissioners are fact-finders, educators, and moderators. Their role is to serve as an intermediary between survivors of child abuse as well as prisoners or known abusers willing to give testimony, and a judicial process of inquiry that is rigorous and that seeks to document, in a transparent manner, these crimes against children in all their forms. [<https://www.itnj.org/commission/commissioners/>]. Robert has published extensively on the subject of pedophilia. He is a vocal advocate for the exposure and criminal prosecution of pedophiles and everyone who aids and abets such horrific crimes. [<https://ahtribune.com/world/asia-pacific/2153-sir-john-walsh-brannagh.html>]; www.amazon.com/exec/obidos/ASIN/B076NT9S5K/ossnet-20 (“Zion in Shiksa-Land: Harvey Weinstein – First Major Jewish Pedophile Domino in the USA”); <https://www.sgtreport.com/2018/03/robert-david-steele-chief-counsel-of-commission-on-pedophilia-explains/>]. Robert has never protected a pedophile or advocated for the protection of any pedophile.

4. Plaintiff, Earth Intelligence Network, is a not-for-profit, 501(c)(3) corporation founded by Robert in 2006 (Virginia State Corporation Commission ID # 0670760-8) (Federal EIN # 20-828XXXX). The original purpose and long-term focus of Earth Intelligence Network is to teach citizens the urgency of demanding holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE) as the foundation for enlightened self-governance. One of Earth Intelligence Network’s projects is called “#UNRIG”. #UNRIG is an educational campaign to communicate to all citizens the possibility of an ethical, legal, non-violent restoration of integrity to the United States Government. #UNRIG’s campaign is funded by public donations. Earth Intelligence Network is fully transparent and accountable to its donors. All funds raised

for the #UNRIG national tour are fully accounted for at the Budget Page published on the website of for the #UNRIG project, <https://www.unrig.net/>.

5. In June 2017, the core team members of the Earth Intelligence Network were Robert and Dr. Cynthia Ann McKinney (“Dr. McKinney”). Dr. McKinney is Catholic. She is the first black woman to be elected to Congress from Georgia. She served six (6) terms as a Democrat. In 2008, she left the Democratic Party to accept the Presidential nomination of the Green Party. Dr. McKinney has an established reputation as one of the most ethical political figures of our time, and one of the most persistent in seeking out the truth on all matters. She is internationally-recognized as a humanitarian and anti-war activist. [<https://www.allthingscynthiamckinney.com/cynthias-story/>; https://www.facebook.com/pg/CynthiaMcKinneyOfficial/about/?ref=page_internal; <https://twitter.com/cynthiamckinney>]. In August 2015, Dr. McKinney completed a PhD in Leadership and Change at Antioch University. [<http://sfbayview.com/2015/08/former-u-s-congresswoman-cynthia-mckinney-completes-phd-at-antioch-university-despite-having-to-scrub-wikileaks-from-her-dissertation/>]. Today, she teaches a US-accredited Master of Business Administration (MBA) program in Bangladesh. At Robert’s request, Dr. McKinney agreed to return home to the United States in 2017 to nurture a national conversation about #UNRIG, called the “Summer of Peace”.

6. Defendant, Goodman, is an individual who is a citizen of New York. Goodman claims to be a graduate of New York University (BFA Film), an actor, and Hollywood cinematographer. Goodman claims to be the CEO of 21st Century 3D, which Goodman describes as “a full-service stereoscopic 3D motion picture production company with offices in New York City and Los Angeles.” Goodman has substantial

experience in the production and upstreaming of live videos. He owns, maintains and operates multiple Internet and social media properties, including a YouTube channel [www.youtube.com/channel/UC8CI9QaRtuW9CNjP7pP4BBQ], a Facebook page [<https://www.facebook.com/Crowdsource-The-Truth-1331354320209243/>], a Twitter account [<https://twitter.com/csthetruth?lang=en>], an account at Patreon.com, [<https://www.patreon.com/crowdsourcethetruth>], and an account at GooglePlus. [<https://plus.google.com/107268876853681007877>]. The name of Goodman's various social media properties is "Crowdsource The Truth" ("CSTT"). Goodman claims that CSTT is the "original open source independent news agency". According to Goodman, "Crowdsource the Truth is an independent news organization dedicated to truth in media and integrity in government. Our process is driven by a unique, open source fact checking 'truth engine' that has been described as a combination of investigative journalism, social media and reality television."

7. As of September 1, 2017, 14,526 people subscribed to Goodman's YouTube channel, 1,925 people followed Goodman on Facebook, and Goodman had 8,886 followers on Twitter. As of March 23, 2018, 53,447 people subscribed to Goodman's YouTube channel, 4,189 people followed Goodman on Facebook, and Goodman had 21,700 followers on Twitter. Goodman uses his YouTube videos, Twitter account and Patreon to advertise the business of CSTT and for purposes of trade. Goodman solicits donations, advertises products and derives revenue from the videos uploaded to his YouTube Channel, to his Facebook, to his Twitter account, to Patreon.com, and to other social media properties controlled by Goodman, including www.truthleaks.org. In the "About" section of his YouTube channel, Goodman solicits

financial support for his social media publications via “Public Bitcoin Payment Address” [<https://blockchain.info/address/14y2bEJ484DTbQwthX51VWpcRtk9Q7kmQQ>], “ETH payment address” [<https://twitter.com/csthetruth/status/939905920699691009>], “Public Litecoin Payment Address” [*id.*], “Public Monero Payment Address” [43wUVqtP6gZAUow6DKgQxzCCcKtRpinV4fKvGmLCpLC6wst4KkYudsN9T3PosWjz3b5ADQU2RWAHSMrzyLJdpg6V2AVb4], and through a PayPal account. [<https://www.paypal.me/crowdsourcethetruth>]. Goodman also encourages people to email him “for a private Bitcoin sponsorship link”. Goodman advertises merchandise, including coffee mugs and men’s and women’s t-shirts, for sale in his “on-line store”. [https://www.redbubble.com/people/csthetruth/shop?utm_medium=email&utm_source=mkem&utm_campaign=&asc=u]. Goodman profits from defamation. The traffic to Goodman’s YouTube channel and his Twitter, Patreon and GooglePlus accounts, including visits by sponsors, patrons and other viewers from Virginia, produces substantial recurring revenue for Goodman. Goodman and his agents have been physically present in Virginia on multiple occasions in connection with the production of his YouTube videos. His websites are active. Goodman’s videos target subscribers, patrons and viewers located in Virginia and elsewhere.

8. Defendant, Negron, is an individual who is a citizen of Massachusetts. In 2017, Negron and Goodman co-produced numerous videos uploaded to the CSTT YouTube channel. Prior to the commencement of this action on September 1, 2017, Negron routinely acted in concert with Goodman to defame Plaintiffs. She appeared and actively participated in virtually every video at issue in this action, one of which was even filmed at her home. After Plaintiffs filed this action, Negron never again appeared

in a YouTube video with Goodman. However, as evidenced by her tweets, Negron continues to be in close contact with Lutzke via Twitter and by telephone. The conspiracy between Lutzke and Negron to defame Plaintiffs continues. Negron's social media pseudonym is "**#TrishTheDish**". She operates Twitter account: **@TrishaDishes**. Negron had 24,300 Twitter followers as of March 23, 2018. Negron last tweeted about Robert on March 23, 2018, when she republished Lutzke's false and defamatory statements:



Negron remains personally active in the attacks on Plaintiffs. On March 19, 2018, she retweeted (republished) false and defamatory statements by Lutzke:



And, on February 24, 2018, Negron published the following false and defamatory statements about Robert (RDS), attaching to her tweet yet another insulting statement by Lutzke:



#TrishTheDish
@TrishaDishes



#SaturdayMorning

How Covert Agents Such As RDS Infiltrate Internet
theintercept.com/2014/02/24/jtr...

- 1) inject false material onto internet to destroy reputation of targets;
- 2) use social sciences to manipulate online discourse

#MAGA 🇺🇸 **#GreatAwakening** ☀️ **#TheStorm** 🌪️ **#QAnon** 🐰

queentut @Queentutnairobi

#queentut Why is Princess Nakamaru's face & hair so much bigger than RDS? Why is his body so small compared to a tiny Japanese female? The proportions are off... looks like a 'paste-up' job. Notice how they staged his open source book



9:52 AM · Feb 24, 2018

9. Defendant, Lutzke, is the person masquerading as “Queen Tut” in the YouTube videos at issue in this action. Lutzke is also the person who is tweeting and retweeting from Twitter account, @**Queentutnairobi**. Lutzke is a citizen of Colorado. In addition to a 911 call made by Lutzke on July 1, 2017 to Fort Collins, Colorado, Police [<http://www.9news.com/article/news/local/fort-collins-csu-police-release-body-camera-footage-of-2-shootings/73-493723062>], which positively identifies Lutzke, Goodman has doxxed³ Lutzke multiple times since Plaintiffs commenced this action. [<https://www.youtube.com/watch?v=kYOikz5mjbw&t=1707s> (Video at 13:50 – “I don’t know that that claim is really, ya, he said it with a straight face, **Susie**...”); <https://www.youtube.com/watch?v=8Tdkawt5FNU> (Video at 14:03 – “even if we accuse him [referring to Robert] of lying about writing the open source intelligence manual, now that’s information that came to me from Queen Tut, a woman who his own lawsuit has revealed to be **Susan Lutzke**.”); <https://www.youtube.com/watch?v=O2MmaE6Wwtk> (Video at 44:22 – Queen Tut is “**Susan Lutzke. Let’s call her who she is**”)] (Emphasis added). On March 17, 2018, Goodman published a video on his CSTT YouTube channel entitled, “**Libel, Lies and Lawsuits – Queen Tut Evidence Exposed**”. [<https://www.youtube.com/watch?v=1koAEHYbZTA>]. In this video, Goodman again positively identifies Lutzke as “Queen Tut”. Goodman admits in the video (at 18:30) that he spoke with Lutzke almost every day while they were producing the defamatory videos at issue in this action. Goodman confirms that Lutzke is “not 80”, as was falsely represented to the Court. Goodman points out that Lutzke submitted false documents to

³ “Dox” means to publicly identify or publish private information about (someone) especially as a form of punishment or revenge. [<https://www.merriam-webster.com/dictionary/dox>].

the Court [*Documents 31 and 33*] in this case [Video at 19:39] and states that Lutzke “is a liar”. [Video at 13:46]. Goodman’s video includes a picture of Lutzke protesting at Colorado State University with a sign that reads, “Kill All Police”:



III. JURISDICTION AND VENUE

10. The United States District Court for the Eastern District of Virginia has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest, costs and fees.

11. The Court has personal jurisdiction over Defendants, Goodman and Negrón, who have made a general appearance. Defendant, Lutzke, is subject to personal jurisdiction in Virginia pursuant to Virginia’s long-arm statute, § 8.01-328.1(A)(1) and (A)(4), as well as the Due Process Clause of the United States Constitution. Lutzke targeted a Virginia citizen and a Virginia non-profit, and has engaged in a persistent and ongoing course of defamation that has injured Plaintiffs in Virginia. Lutzke has

minimum contacts with Virginia such that the exercise of personal jurisdiction over her comports with traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution. Lutzke's videos, tweets, retweets and blogs were (and are) purposefully directed at Virginia and were (and are) continuous and systematic. Plaintiffs' claims directly arise from and relate to Lutzke's publication of false and defamatory statements in Virginia. *Calder v. Jones*, 465 U.S. 783 (1984); *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770 (1984).

12. Venue is proper in the Richmond Division of the United States District Court for the Eastern District of Virginia because the Defendants published and republished defamatory statements to a wide audience that includes persons who reside within the Richmond Division. A substantial part of the events giving rise to the claims stated in this action occurred in the Eastern District of Virginia.

IV. STATEMENT OF THE FACTS

13. On June 15, 2017, Robert was scheduled to be interviewed by Goodman and Negrón. Goodman and Negrón planned to live-stream the interview on CSTT's YouTube Channel.

14. On June 14, 2017, Goodman and Negrón published a video on YouTube entitled, "**Clear and Present Danger (Calm Before the Storm?) #maerskmemphis**". [<https://www.youtube.com/watch?v=ekr5cw2WAbU>]. In the video, Goodman and Negrón claimed that CSTT's "George Webb" had "intel" from "Deep Uranium"⁴

⁴ "Deep Uranium" is a pseudonym for a "confidential Crowdsourcing Operative" codenamed "Mr. Hudson". Goodman claims that the character "Mr. Hudson" has "over 40 years of military, intelligence and clandestine experience". [<https://www.youtube.com/watch?v=TWUI8gDPFx0&feature=youtu.be&a>].

indicating a “strong possibility of Clear and Present Danger due to illicit radiological material on board” transoceanic container ship, Maersk Memphis. Goodman also published a video on YouTube of his interview with “George Webb” about the Coast Guard’s “sweep” of the Maersk Memphis for a “dirty bomb”. [<https://www.youtube.com/watch?v=Tj-EUz5JeFQ&feature=youtu.be>]. Goodman and Negron encouraged the “Crowdsourcing community” to spring into action and alert the United States Coast Guard that there was a “dirty bomb” aboard the Maersk Memphis. At 1:54:50 of the video, Goodman told CSTT subscribers to “Call the port authority – that’s an excellent idea. Someone call the port authority there – in Charleston.” Someone, in fact, called in the putative dirty bomb threat, which caused a terminal at the Port of Charleston, South Carolina, to be shut down.

15. In truth, there was no “intel”. Goodman and Negron concocted fake news. The dirty bomb was a hoax.

16. The Federal Bureau of Investigations (“FBI”) immediately opened an investigation into the false report of a dirty bomb aboard the Maersk Memphis. The FBI opened its investigation because it is a crime to make a false threat against a U.S.-flagged ship. [<https://www.reuters.com/article/us-south-carolina-terminal-threat/fbi-opens-probe-of-false-dirty-bomb-threat-at-south-carolina-port-idUSKBN1960DN>].

17. Because of the “Dirty Bomb” hoax, Robert chose to distance himself from Goodman, Negron and CSTT. Robert immediately canceled the planned interview. He informed Goodman by private email that he (Robert) no longer wanted anything to do with Goodman and CSTT.

18. Upon receipt of Robert's email, and in retaliation and reprisal for Robert's decision to no longer have anything to do with Goodman and CSTT, Goodman, Negrón and Lutzke began an unprecedented smear campaign against Plaintiffs.

A. False and Defamatory Statements Prior to September 1, 2017

19. Beginning on June 15, 2017 and continuing through August 30, 2017, Goodman, Negrón and Lutzke combined, associated, agreed and acted in concert (most times together on camera) to publish the following false, defamatory and actionable statements of and concerning Plaintiffs:

a. On June 15, 2017, Goodman and Negrón produced and published a video on YouTube entitled, "**Deep State Panic Attack**". As of March 23, 2018, the video was accessible by clicking the following hyperlink: <https://www.youtube.com/watch?v=461eDj6Rxqw&feature=youtu.be>. In this video, Goodman encourages viewers to demand a return of their donations from #UNRIG. At 4:24 of the video, Goodman states "The comments I kind of agree with. I was a little bit cautious with Robert David Steele and I didn't trust him either, Pamela, when he went on Fandango's⁵ show yesterday ... so yeah, I want my money back too Karen. I'm going to go call American Express and see if I can cancel that donation." At 20:55 of the video, Goodman states "So Alex says RDS is a scam. I got to admit I feel a little betrayed by him".

b. On June 16, 2017, Goodman produced and published a video on YouTube entitled, "**Getting the Dirty Bomb Story Straight**". As of March 23, 2018, Goodman's YouTube video was accessible by clicking the following hyperlink:

⁵ The reference to "Fandango" is a reference to Manuel Chavez, a content creator and publisher of videos, known on the Internet as "Defango".

<https://www.youtube.com/watch?v=OBBrE3lehCY&feature=youtu.be>. At 20:24 of the video, Goodman states “We made a big mistake with Robert David Steele and I’m going to have to communicate with him about this ... We’ve raised a lot of money for him. We need to apologize to you guys for doing that, and I’m not suggesting. I’m not saying you should get your money back from Robert Steele. He specifically told me he would get very pissed if people did ask for their money back which I found a curious thing for him to say.”

c. On June 16, 2017, Goodman and Negrón produced and published a video on YouTube entitled, “**The Failing New York Times**”. As of March 23, 2018, the Goodman/Negrón YouTube video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=CS0GZaR6b6U&feature=youtu.be>. Using *Skype* or a similar joint communication software tool, Goodman and Negrón appear together in the video:



As with all the videos at issue in this action, “The **Failing New York Times**” was scripted ahead of time. Goodman and Negron discussed the subject matter and content via email, telephone and/or text message. They agreed upon the thesis, theme and tone. Goodman and Negron speak with one voice. Negron makes no attempt to correct, contradict or distance herself from Goodman. At 16:10 of the video, Goodman states “I want to invite our friend, Robert David Steele, to uh give back the money to all the people that we raised money for his organization the other day. We have been getting so many emails from people who are angry and I don’t want to tell everybody to demand their money back because Robert David Steele has specifically told me I had better not do that, so I’m inviting him to graciously refund it to anyone who is angry again, and there are a lot of people.” At 24:45, Goodman states “So I’m making an open call right now. Everyone should just go directly to their credit card company and cancel the charge and if there are financial crimes experts out there I’d like to know if its legal for Mr. Robert David Steele to make up lies about me ... and spread these lies to our viewers”. On and after June 16, 2017, many of #UNRIG’s donor’s followed Goodman’s direction, and demanded the return of their donations. Some, acting upon Goodman and Negron’s advice and at their direction, filed claims of “fraud” with their banks to undo and reverse the donations to #UNRIG.

d. On June 20, 2017, Goodman and Negron produced and published a video on YouTube entitled, “**COG**”. As of March 23, 2018, the video may be accessed by clicking the link: https://www.youtube.com/watch?v=gaa_XEP4lb4&feature=youtu.be. Goodman and Negron again appear together in the video, which is filmed from a hotel room in London, England:



In the video, Goodman and Negrón speak jointly about Robert. Beginning at 25:26 of the video, Goodman states “**Trish – I’m glad you mentioned stealing**, because you’ve just reminded me of something – particularly the robber David Steele ... Many of our viewers have expressed real anger at feeling tricked by the campaign from Robert David Steele. And I assure you, we were tricked by him as well”. (Emphasis added). Negrón makes no attempt to correct Goodman. By her silence and visual expressions of agreement in the video, she joins in his false and fraudulent accusations of stealing and fraud. At 1:13:00 of the video, Goodman calls Robert the “robber David who Steals”. At 1:13:55, Goodman and Negrón address Robert directly. Goodman again calls Robert the “robber David who Steals from our audience ... and puts out false information”. And, at 1:17:21, Goodman, for a third time in a single video, falsely accuses Robert of stealing from the CSTT audience.

e. On June 26, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, “**Queen Tut call re: Robert David Steele #Unrig Fraud Claim**”. As of March 23, 2018, the video was accessible by clicking the following hyperlink: https://www.youtube.com/watch?v=hR6uxM_wyMs. Goodman describes the video as follows: “The angry response from the Crowdsorce community regarding the individual I have (somewhat) jokingly dubbed ‘The Robber David who Steals’ has been overwhelming. Many Crowdsorce community members have been sending me email exchanges they have having [sic] with RDS and they are not happy ... Confidential Crowdsorce contact Queen Tut believes RDS has perpetrated a deliberate fraud and details her position in this phone call.”.⁶ The video features a still shot of Goodman and Lutzke together:



⁶ The videos uploaded to YouTube solicit money from viewers, subscribers and patrons and contain a “Legal Disclaimer”: “Sponsorship of Crowdsorce the Truth is made at the sponsor’s sole discretion. Sponsorship funds are not tax-deductible, are non-refundable, and do not represent any ownership, equity interest or decision-making authority in the organization.”

During this interview, Goodman and Lutzke make the following false and defamatory statements: At 2:49 of the video, Goodman states, “Well I think he’s a targeter, he’s a person er I mean I question if he, if any of his credentials are authentic. I think he’s just a cheap con man.” Lutzke then says, “I totally agree”. At 3:42, Goodman states, “Well that’s his motto. What can you do for me?” At 4:18, Goodman states, “He knows it’s a useless campaign he’s just trying to suck \$250,000 out of people.” At 4:52, Lutzke states, “Oh man, I get it. He’s really conning people and he’s trying to manipulate me.”. At 6:11, Lutzke states, “That’s the last email I sent and I knew I got him ok.” At 8:21, Goodman states, “I think he’s involved in a pretty serious financial scam. Uh, I think that there’s a possibility that a Rico charge could be involved because he has Defango with him. I think that he’s uh defrauding people across state lines. I mean I’m not a lawyer of course, but it seems like he is doing things that are very criminally actionable.” At 9:13, Lutzke states, “His MO of like threatening and crushing the little guy, but sucking up to the power players is very obvious.” At 11:02, Goodman states, “You know I’m obviously not a mental health professional but it certainly seems he’s got some kind of schizophrenic behavior there.” Lutzke then states, “And I believe he is an intentional operator”, to which Goodman states, “Oh, I agree”. At 13:43, Lutzke states, “When you look at his behavior, his pattern of behavior with this scam of the Electoral Reform ... I think Cynthia is the latest in the reinvention”. At 26:26, Goodman states, “Its people who are sick and tired of people like Robert David Steele. The robber David who Steals.”

f On June 26, 2017 at 2:11 p.m., Goodman republished his interview with Lutzke by tweeting the YouTube video to his Twitter followers.

g The June 26, 2017 Goodman/Lutzke YouTube video was republished on multiple different websites, including *www.SexyFunnyClips.com* and *www.Reddit.com*. As of March 23, 2018, the republication may be accessed by clicking the following hyperlink: http://www.sexyfunnyclips.com/video/hR6uxM_wyMs/queen-tut-call-re-robert-david-steele-unrig-fraud-claim/. The video also remains on Reddit. [https://www.reddit.com/r/TruthLeaks/comments/6jrmg2/jason_queen_tut_call_re_robert_david_steele_unrig/?st=jf5o5ium&sh=18d64c08].

h On June 27, 2017, Goodman produced and published a video on YouTube entitled, “**FRANK BACON Call Regarding Robbing and Stealing #unrig**”. As of March 23, 2018, the “FRANK BACON” video was accessible by clicking the following link: <https://www.youtube.com/watch?v=-JqDBOusiF8&feature=youtu.be>. As part of the modus operandi of the conspiracy and the scheme to defame Plaintiffs, Goodman and Negron employed caricatures to hide the identity of the speakers. The “FRANK BACON” video features Goodman speaking with an anonymous person who is represented by the caricature of a hotdog and a strip of bacon:



At 2:38 of the video, Goodman states “Let’s assume for a moment he’s a con man or a hypothetical situation in which he may be a con man, claiming to be an ex-CIA agent is sort of the perfect con.” At 10:21, Goodman admits that he personally contacted the Coast Guard and represented that he had “intelligence” coupled with Government reports that a “dirty bomb” was on board the Maersk Memphis, and he “instructed” the Coast Guard to inspect the ship. At 19:25, Goodman calls Robert a “loser”.

i. On June 29, 2017, Goodman and Negrón produced and published a video on YouTube entitled, “**Squidward v. Sponge Bob**”. As of March 23, 2018, the video was accessible on the Internet by clicking the following hyperlink: <https://www.youtube.com/watch?v=Z0Jqux7GQII&feature=youtu.be>. Goodman and Negrón again appear together on video. Again, they engage in a joint discussion about Robert in which they (with Goodman as lead spokesman) make false and defamatory statements about Plaintiffs:



At 19:10 of the video, Goodman states “What Google helped him do was to file privacy complaints [Goodman indicating quote/unquote “privacy complaints” on video] for videos that we have that include evidence of Robert David Steele committing fraud, and he’ll now make a privacy complaint about this, but to say that is like saying Google helped me to search for something. The entire corporation helped me when I typed in is Robert David Steele a lying moron? and the answer came back yes.” At 27:37, Goodman states “I will say the Robber David who steals has already put a privacy complaint on that video.” At 27:58, Goodman states “if you’re going to appear on there [the Alex Jones show, *Infowars*] ...and you are going to claim to be nominated for a Nobel Peace Prize even though you are doing the nominating yourself or having some friend of yours do the nominating. Incidentally, I hope that the members of the Crowdsourcing community will nominate Mr. George Webb Sweigert, Patricia Negron, and myself, Jason Goodman, for Nobel Peace Prizes not because I think we deserve it because I want to show what a fraudster this individual is.”

j On June 29, 2017 at 4:34 p.m., Goodman republished the “Squidward v. Sponge Bob” YouTube video by tweeting the video to his Twitter followers.

k. In the YouTube video “**Squidward v. Sponge Bob**”, Goodman and Negron refer to a video interview conducted by Goodman in which Goodman appears jointly with and talks to yet another anonymous caricature, “Squidward Tentacles”:



“Squidward Tentacles” is a character that appears in the animated television show, “Spongebob Squarepants”. As of March 23, 2018, the video interview may be accessed by clicking: <https://streamable.com/zf4vl>. The voice of “Squidward” is altered and anonymous. Goodman, *inter alia*, publishes the following false statements by “Squidward”: “this gentleman [referring to Robert] came on your show and he deceived 10,000 people to donate \$15,000 ... he committed interstate wire fraud”. Goodman replies, “I’ve suspected that from the beginning, yes ... I think he’s deceived Dr. McKinney as well”.

1. On June 29, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, “**Queen Tut call 002**”. Goodman and Lutzke originally posted the video to CSTT’s account at Patreon.⁷ [<https://www.patreon.com/posts/queen-tut-call-12378470>]. The video has since been removed. As of March 23, 2018, the video

⁷ “Patreon.com” is a social media membership platform that “makes it easy for content creators to get paid” for creating videos, blogs, songs, etc. Fans subscribe and pay a few bucks per month OR per video, and the content creator gets paid by Patreon every month or every time he release something new. [<https://www.patreon.com/>].

was accessible by clicking: [<https://streamable.com/pnmul>]. Goodman and Lutzke again appear together on video, and again engage in a joint discussion about Robert. At 5:11 of this video, Goodman states “[h]opefully, the FTC or some other law enforcement body will, can take this over and prosecute him [referring to Robert] with criminal charges”.

m. On or about July 1, 2017, Goodman produced and published the following false statements on WatchTV [See <https://watchyt.com/videos/robert-david-steele?v=hMJJoAO5OZY8>]: “We have officially withdrawn our endorsement of Robert David Steele and his organization due to his disingenuous behavior and numerous complaints from the Crowdsourcing community.”

n. Goodman, Negron and Lutzke also employed agents and trolls to “crowdstalk” and defame Robert and #UNRIG. Goodman, Negron and Lutzke, who were online everyday surfing the Internet for all things related to Plaintiffs, would learn that Robert was going to be interviewed or was giving an interview. Goodman, Negron and Lutzke would instruct and direct agents (trolls) to publish insulting, false and defamatory comments about Robert during the interviews. There were many instances of this happening, including comments made during a July 11, 2017 interview with Project Camelot. [see https://www.youtube.com/watch?v=VwHY_fZv5HI&feature=youtu.be]. During this interview, the following comments were made about Robert by a person who identified themselves as “Patrick McClellan”:

“I think Steele is a scam artist and a cabal whore. Ask him why he stabbed George Webb in the back. He did a classic hit job on them. Cozied up to them real nice, had them raise several thousand dollars for his little email scam, and then acted like they were dangerous fugitives. These kind of cowardly weasels are the perfect type that the cabal use to make themselves and by association those he ‘interviews.’ Kerry, I care about you and I don't want you getting roped by these turds, especially when I know your heart is sincere and vulnerable to naivety. I saw that poor kid Jordan Sheridan got hoodwinked too. This guy is pure toxic.”

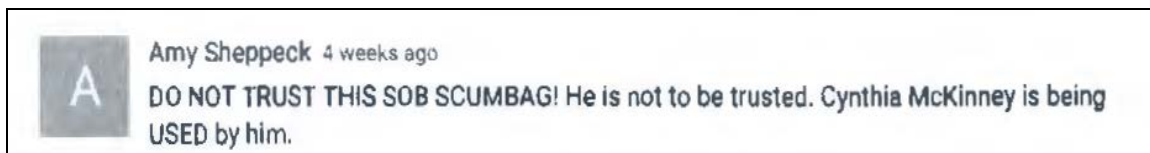
The “Hound of Time” made the following statements about Robert:

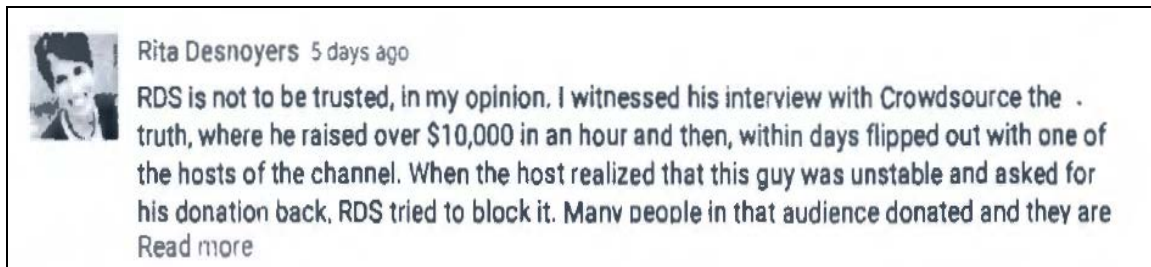
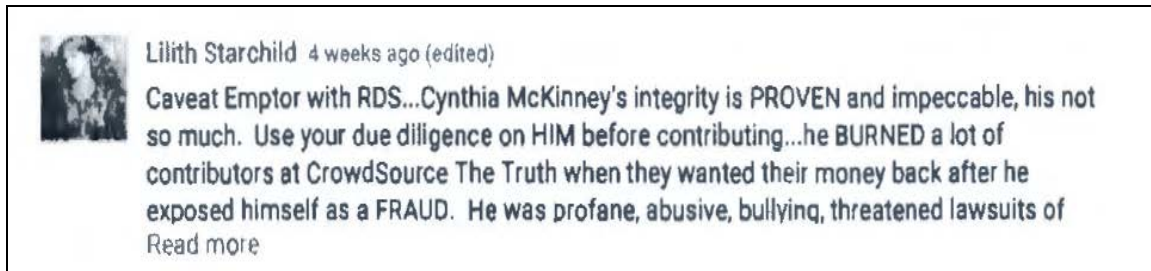
“This guy is a complete psychopath, why is that people don’t see it? He has all the traits, the discourse, the mirroring and appropriation of it’s victims (and others) reasoning, the stalking, etc. He is a case study in the art of deceit. I understand Camelot is a great platform to study the snake oil salesman, the copy cat narratives for a buck, the Wikipedia copy/paste books for sale and so on. With the (very obvious) exception of genuine researchers, it's looking more then ever a psy-op hangout.”

As another example of the attacks upon Robert, vicious public comments and statements about Robert were posted by Goodman and Negrón’s agents during Robert’s interview with Jeff Rense on July 20, 2017. The comments may be accessed by clicking: https://www.youtube.com/watch?v=o_YRbkzqfik. The comments include the following:



Further egregious public comments and statements about Robert were posted by Goodman and Negrón’s agents during Robert’s interview with Claudia of *Cabin Talk* on August 2, 2017. The public comments may be accessed by clicking: <https://www.youtube.com/watch?v=bhPVHAlbm24&feature=youtu.be>. The comments include the following:





o. Goodman, Negrón and Lutzke's videos reached hundreds of thousands of YouTube subscribers, who republished the statements over and over and over again to their subscribers between June 15, 2017 and September 1, 2017. Goodman, Negrón and Lutzke's joint effort to destroy Robert's reputation and to injure #UNRIG were intentional, planned and systematically executed across all social media.

p. Goodman also employed agents to communicate on his behalf directly with Robert via email. One such agent is a person "Ralph O. Davis" ("Davis") from Richmond, Virginia. Davis emailed Robert on multiple occasions in June, July and August 2017. On July 3, 2017, Davis emailed Robert as follows:

"Robert, I thought there might be an outside chance that you're a big enough person to willingly reconcile w/Jason for reasons beyond your still inexplicably vehement derision of him based on your stated subjective 'suspicion' of his supposed Mossad affiliation. Sadly, I apparently misjudged you. There's no independent or verifiable support for that view yet you cling to it as matter of fact. It's wholly irrational, ..or you have a covert agenda to disrupt for personal or professional motives.

Since you're unwilling to even acknowledge your provocative role in primary responsibility of this petty distraction, I have no further expectation of its satisfactory resolution and can't in good conscience support someone so compromised by exercise of unstated agenda. I therefore reiterate my request for refund of my \$100 contribution. It was based on presented sensibilities that you now appear to disingenuously manufacture when seeking to appeal, then conveniently discard when your personal agenda overrides any sense of obligatory responsibility to principles you alleged to champion. In doing so you contradict what you purport to represent as ostensible reformer of malfeasance. It's very disappointing and troubling considering the rarity of people actually aware, awake and moved to the necessity of reestablishing standards of morally responsible behaviors where that matters most.

You now appear to willfully represent something cynical and hypocritical to any higher purpose and by doing so misrepresented yourself and your intent in your violent about face after the interview with George Webb for what's clear now as no real reason.

You've willfully defrauded. Please process the refund asap."

On July 14, 2017, Davis emailed the following:

"Good morning, Robert. How in hell are you? It's certainly where we are if only in its better suburbs, eh? The degree of mayhem presently building is truly mind boggling, and you certainly seem tainted by one of its many afflictions, so sorry to say.

As I responded in the below to one of your bedfellows who used the same tactics to vilify those you, too, betrayed so willfully, if more personally, I noted that for every such Tom, unfortunately, there's a Robert as well. Not good of you, my friend. Not honest, ethical or intelligent in true sense. Deceit and betrayal never goes out of style for those with corrupt agenda. So, Robert, how, in hell as it were, do you restore to government what you do not possess in the first place?

...

Do the right thing, Robert. Refund what you took through fraud."

Just as Goodman, Negron and Lutzke's videos got nastier and more malicious over time, so did Davis' emails. On July 28, 2017, Davis sent Robert the following email:

Hey, Robert! How goes life of fraudulent crime in total political pretense, my fakey friend? It can't make anyone proud, can it? You have kids, don't you? So, does Cynthia have any suspicion that she's hooked-up with a smiley, shady character who's setting her up for a fall? Life must get complicated when blow-back ensues, as it inevitably does. While you do talk a good line, I must admit, it's one that self exposes the inevitable contradictions that you just can't dance around for long. Is it ever embarrassing that your nasty little smear attempt only damaged your own cover? Too bad for Cynthia, good lady she apparently is, to have found herself in the grip of a pro-co-intel charlatan handler.

Anyway, still time to redeem yourself if you fess-up, do compensation and beg your many victims for forgiveness, you old fraud. George and Jason continue to gain deserved traction with Awan's arrest and the avalanche of evidence now finding light of day that can't be suppressed as you and yours must have hoped. But, you, too, will find yourself exposed, Robert. Sad day that, eh? It will feel like sitting on top of a pile of depleted uranium that you've attempted to obscure.

Why not get started first with a public apology to Jason, George, Trish and Cynthia, then refunding all those you've pretentiously defrauded? Imagine the sense of freedom from convoluted fiction! As difficult as it is for you, do the right thing."

On August 9, 2017, Davis emailed Robert as follows:

"Well, Robert, I understand how time consuming it must be trying to persuade an unsuspecting audience that you're; 'Authentic, Inclusive, and Truthful', (AIn'T) ..when it just ain't so. What tangled web, eh, my contradictory snake-oil friend?

Maybe Alienate, Incite and Trouble would be more apropos to your agenda? So, has Cynthia caught on yet to your set-up for her fail? It's just a matter of time unless you make amends to those you've already betrayed. So, to that end, please send the refund that you solicited on false pretenses at your earliest opportunity.

You may be aware that all of your recorded slanderous assertions regarding George and Jason are now coming back to haunt your laughably pretentious themed bus tour. Seriously, better think harder about reconciliation over law suits."

q. On August 7, 2017, Goodman, Negron and Lutzke produced and published a video on YouTube entitled, "**Queen Tut 003**". As of March 23, 2018, the video may be accessed by clicking: <https://www.youtube.com/watch?v=l-wxMiqpc3k>.

Robert was notified of the video by Carrie Lavender. The video features a still shot of Goodman and Lutzke together:



At 10:42 of the video, Goodman claims to have been contacted by a “secretive group”. Goodman bleeped out the name of the “secretive group”. At 11:02, Goodman states to Queen Tut that “they were very interested in communicating with you [Queen Tut] about your research into the activities of our friend Robert David Steele.” At 11:18, Goodman stated that “they want to basically [bleep] Robert David Steele, [bleep] and they felt that you had presented good information that might lead them in that direction, specifically with regard to your communications with Rand Paul’s office and Robert David Steele’s misrepresentation that he was having them draft a bill for him, and the fact that he had raised money under that representation that that was happening.” Queen Tut replied, “I’ve got all the emails, Jason, I’ve got it all.” At 12:08, Goodman states to Queen Tut “I want to put you in touch with them ... I’ve only spoken to them for a limited amount ... I

find it really difficult to believe that he was ever in the CIA because he just seems so fucking stupid ... he's engaged in an operation to compromise Cynthia McKinney and basically co-opt her credibility and ... destroy her reputation."

r. On August 8, 2017, Goodman and Negrón posted a video on YouTube entitled, "**Live from John Glenn Airport**". As of March 23, 2018, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=7xuaSolIufl&feature=em-lss>. As with all other videos, Negrón actively participates and collaborates with Goodman in the production of this video:



At 31:51 of this video, Goodman states that "we gotta get to Cynthia McKinney ... we got to get to Cynthia McKinney and keep letting her know what we are being told is

going on with that whole UNRIG campaign”.⁸ Robert received a link to this video via email from a follower of #UNRIG. The email states, “I thought u mite like to know that in this video Jason says he needs to tell Cynthia about what's really going on in the unrig campaign ??? He will not stop!”

s. On August 9, 2017, Goodman agent, Scott Creighton (“Creighton”), operating under the pseudonym “AmericanEveryman”, posted a video on YouTube entitled, “**Enough about Your Problems with Rabid Zionists Richie. I need some MONEY!’ Robert David Steele**”. As of September 1, 2017, the video could be accessed on the Internet by clicking the following hyperlink: <https://www.youtube.com/watch?v=BZKvvrZQ5BQ&feature=youtu.be>. At Goodman’s direction, Creighton posted the following words together with the video: “I am so sick of snake oil salesman Robert David Steele but he keeps showing up on all these alternative left-leaning news programs and not a damn one of these interviewers actually interviews the fucker. They’re infomercials for the prick and his #UNRIG scam. It makes me sick.” YouTube has since terminated Creighton’s YouTube Channel and deleted Creighton’s video because it violates YouTube Community Guidelines and Terms of Service.⁹

t. On August 11, 2017, Goodman published the following false and defamatory statements in an email to Dr. McKinney:

⁸ The Defendants initially praised Dr. McKinney. After she refused to acknowledge them and stood by Plaintiffs, however, the Defendants maliciously turned on Dr. McKinney and repeatedly defame her.

⁹ Creighton is a citizen of Florida. He is currently a defendant in a defamation case pending in the United States District Court for the Western District of Virginia. *Gilmore v. Jones*, Case 3:18-cv-18-GEC (W.D. Va.). The Plaintiff in *Gilmore* alleges that Creighton engaged in the identical type of social media defamation that is at issue in this case.

“From: Jason Goodman <truth@crowdsourcethetruth.org
Subject: Your association with Robert David Steele

Dr. McKinney,

Both myself and George Webb have made several attempts to contact you, but have not received a direct response. I hold you in very high regard and I am slightly confounded by your decision to align with Robert David Steele. In my estimation he has repeatedly made ignorant and even racist comments, has defrauded my audience of money, has personally and publicly insulted me and is actively attempting to co-opt your credibility to raise funds. I would really appreciate it if you would agree to an interview via Skype to address these concerns. Many people in our audience have concerns about your association with RDS given his ongoing abusive behaviors documented in a number of videos. Thank you for your consideration, I await your response.”

u. On August 11, 2017, Lutzke entered an educational chat room managed by Dr. McKinney, using the pseudonym “Pat”. Lutzke posted the following question and comments:

“Guest Pat

00:50AM

Cynthia: Is it true that your student loans are being paid off from UNRIG funds? RDS states this on his website.”

Dr. McKinney replied to Lutzke as follows:

Cynthia McKinney

04:03AM

Hi Pat, you must've missed Robert's very public statement that donated IndieGoGo funds go solely for #UNRIG operational costs. Robert David Steele has stated this policy publicly, which I wholly endorse.

Dr. McKinney further stated to Lutzke:

Cynthia McKinney

04:22AM

I invite you, as with all others, to visit <http://www.allthingscynthiamckinney.com/unrig/> and read the concept, mission, and vision statements and then to join with us at #UNRIG to make our vision a reality. I think it's about time that we as the people of the US were able to rise above the divide and conquer strategy that has worked so well for so long and come together to unrig our very unfair, rigged system that allows certain individuals inside it to literally kill innocent people at home and abroad with impunity."

v. On August 13, 2017, Goodman, Lutzke and Negron produced and published a video on YouTube entitled, **"Queen Tut 005 - Damning Evidence of Fraud in the #Unrig Campaign"**. As of March 23, 2018, the video may be accessed by clicking the link: <https://www.youtube.com/watch?v=ZhbeltyhnVk&feature=youtu.be>. A description of the contents of the video states, "Queen Tut is back with a vengeance as she rains hellfire down on Robert David Steele's fraudulent activities with regard to the #Unrig campaign. We invite Dr. McKinney to come forward and explain her continued affiliation.". The video refers explicitly to emails and document exchanges between Goodman and Lutzke in furtherance of the conspiracy to defame Plaintiffs. Goodman, Lutzke and Negron appear in a still shot together throughout the video. As represented by the still shot, the Defendants have combined and act in concert to defame Plaintiffs:



As evidence of the conspiracy between the Defendants, at 1:27 of the video Goodman confirms that **“I really want Trish and you and I to really collaborate on this going forward”**. (Emphasis added). At 2:39, Negron states “You know Queen Tut, I had seen an interview on Infowars when they were talking about the UNRIG came and just all the body language coming from RDS was just deeply disturbing to me and suggested, you know, a lot of maybe ulterior motives”. At 3:25, Lutzke states “There’s a theme here that I see going on ... I introduced the first idea, Jason and I did in June, about this scam, the UNRIG scam”. At 5:04, Lutzke states that there is a “dynamic that’s coming off of Robert David Steele [in interviews with females] which I consider to be abusive”. At 5:08, Negron states that Robert is “predatory in nature”. At 6:10, Lutzke states “I just want to make the statement that it is my assessment that Robert David Steele and Cynthia McKinney have a pay-to-play operation going on”. At 14:42, Lutzke states “the UNRIG scam. It’s a total scam ... That’s what it needs to be called because that’s what it is.” At

14:52, Goodman states that the objective of the UNRIG campaign is to “get money” for Robert. At 15:06, Lutzke states that “absolutely ... the bottom line is money for Robert David Steele.” At 16:18, Negron states that the CIA “probably told Robert he could keep whatever money he raised”, which Goodman comments, “exactly, exactly”. At 18:18, Lutzke states “Cynthia McKinney knows that RDS is soliciting donations in her name to pay off her student loans, taxes, and to provide some type of compensation.” At 18:48, Lutzke calls Robert “the creator of the UNRIG scam”. At 24:59, Lutzke states “Robert David Steele is the architect of all the scam and has promoted and stated many, many lies, constantly. He consistently lies”.

w. As of September 1, 2017, the Queen Tut 005 video had received approximately 10,250 views. Through March 23, 2018, the video has received over 14,080 views. Reaction to the video was instantaneous. On August 14, 2017, Robert received an email about the video that reads: “I support #Unrig and hold you both in High Regard - WTF is this about?”. Even long-term supporters of Robert and UNRIG were impacted by the Queen Tut 005 video. One such supporter emailed Robert as follows:

“Robert,

This video <https://www.youtube.com/watch?v=ZhbeltyhnVk> is causing us some problems at VL. I am getting numerous emails, pms and comments about it asking me to rethink my support for #UNRIG.

Yes, many are Goodman shills but a few are genuine long time subs of mine. With that said, I need to address this asap to nip it in the bud. If you want to address it with an update video, that would be great, if not, I can do it.

Bottom line is that I need to be able to report with confidence that the allegations in the Goodman video are without merit.”

Another person reported to Robert that:

“I finally listened to the new Queen Tut video. Jeez! When I thought they couldn’t go any lower! Trish Negron says defamatory things about you, e.g calls you a predator. All three defame Cynthia a lot too.”

x. On August 17, 2017, Goodman, Negron and Lutzke produced and published a video on YouTube entitled, “Parallels to Soros: Micro to Macro”. As of March 23, 2018, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=A6lRmZOOBAs>. Despite its title, the video is clearly about Robert and #UNRIG. The video opens with a photo of George Soros superimposed on a picture of Robert:



The video is filmed at Negron’s home in Massachusetts, which Goodman refers to as “Casa de Trish”. [Video at 0:31]. The video features Goodman, Negron and Lutzke acting together and in concert on camera to defame Plaintiffs:



Goodman, Negron and Lutzke are also accompanied on camera by Creighton. The video repeats and republishes the same false and libelous allegations about “deception” and other wrongdoing by Robert. Creighton states that Robert is “shady”. He repeats multiple times that Robert is a “snake oil salesman”. Creighton repeats and republishes false and defamatory statements about Robert similar to those published in his July 23, 2017 YouTube video entitled, **“What is Cynthia McKinney Doing with Robert Steele in this #UNRIG Thing”**. Referring to Robert, Creighton writes “What the hell is Cynthia doing teaming up with this disinfo asset?” As of September 1, 2017, the Creighton video was accessible by clicking the following link: <https://www.youtube.com/watch?v=06K6h-Zs6g4>. It has since been removed from YouTube. At 24:26 of the **“Parallel to Soros”** video, Lutzke states that “this kind of person [referring to Robert] is a danger to the alternative news community and he has been operating for way to long ... We want him to be gone now”. At 29:24, Lutzke

states that Robert's interviews reveal his "schizoid and abusive behavior." At 40:14, Goodman, Negron and Lutzke laugh derisively about Robert. Lutzke repeats and republishes many of the statements made in prior videos, including **Queen Tut 005**.

y. On August 26, 2017, Goodman, Negron and Lutzke produced and published a video on YouTube entitled, "**Unrig Cynthia McKinney**". As of March 23, 2018, the video may be accessed by clicking the following hyperlink: https://www.youtube.com/watch?v=tSI0ZfIsN_k. The video features Goodman, Negron and Lutzke once again together, acting in furtherance of their common goal – defaming Plaintiffs:



At 8:53 of the video, Goodman states "it's keeps getting stronger and stronger the evidence of fraud". Beginning at 9:05, Lutzke states "what **we** started in June,"¹⁰ where I was able to present evidence about the Electoral Reform Act of 2017 being a scam that he had been perpetuating for a number of years ... That the whole Electoral Reform Act is

¹⁰ The specific pronouns and identical language employed by the Defendants demonstrates that they were acting in concert and that they harbored spite, ill-will and actual malice towards Plaintiffs.

not an act ... it's a scam." (Emphasis added). At 10:09, Lutzke states "The Electoral Reform Act, once again, it's not an Act. It's a scam". At 10:30, Lutzke states "It's fascinating to see that this UNRIG scam is continuing um no matter how much exposure we've given about this fraud that RDS feels completely confident going forward with this scam and Cynthia McKinney with him." At 15:41, Goodman states "Now I want to clarify something because we're not doing this to be vindictive, we're not doing this because we dislike Robert David Steele, although I personally do. We're doing this because [laughter] ... [Goodman changes the subject]". At 16:53, Goodman states "Robert David Steele's behavior represents the exact same type of fraud that sucks out money from the population. He's lying. He's, you know, representing that he's going to do this Election Reform Act, but as Queen Tut has pointed out, there's evidence that he has made no effort to do that and in fact has misrepresented efforts that he has claims to have made, which he clearly has not." At 17:42, Goodman states "So this is what we're doing to sort of take some power away from Robert David Steele and disallow him from cheating people like this." At 19:06, Lutzke states "And this is the nail in the coffin for Robert David Steele's platform for being the Open Source guy. He is not the open source guy, he never has been ... He's created a scam for many many years and he's been defrauding people for a very long time." At 20:47, Goodman states "It's another example of someone co-opting the credibility, Robert David Steele co-opting the credibility of Cynthia McKinney who is someone a lot of people trust." At 21:08, Goodman states "I've been super disappointed that we keep reaching out to her (McKinney), we keep reaching out to her, and she's not directly responding to say why are you involved with this guy". At 21:32, Negron states "No, he's a serious con man, but I mean the bigger

point being, you know that this is a serious fraud. I mean that it is a fraud. No question.”

At 22:50, Lutzke states “Everybody out there you need to email people or Twitter people and tell them Robert David Steele is over, his whole platform is over because General Kernan has stated so.” At 23:44, Goodman states “He’s one little brick in that in that huge gigantic wall, and if we could take out the bad bricks one by one, maybe the wall will collapse.” At 24:46, Goodman states “So if someone like Robert David Steele can infiltrate that community be perpetuating the same kind of false narrative and permeate what we all perceive as real news from honest independent journalists that could very well be his purpose, we don’t know, but that’s what we are trying to expose.” At 26:36, Lutzke states “Robert David Steele and UNRIG are trying to raise money, as much money as they possibly can to fund their little scam.” At 27:35, Lutzke states “She [Cynthia McKinney] is still part of that fraud”. At 27:57, Lutzke states “See these scams continue.” At 28:05, Queen Tut states “Cynthia McKinny is also a fraud too. [Goodman interjects “oh”]. She is willing to associate with Robert David Steele”. At 30:05, Goodman states “This is Queen Tut talking about the uh fraud that is UNRIG and what we have just heard from the Queen is that Cynthia McKinney by remaining complicit in this fraud is herself.” At 35:48, Lutzke states “Why would she continue to associate herself with somebody who has been proven to be a fraud by a retired Army General.” At 36:48, Negron states “Which would explain her being susceptible to this fraud by Robert David Steele”. At 39:41, Lutzke states “I believe that she [Cynthia McKinney] is a pro-Islamic Brotherhood sympathizer”. At 39:55, Lutzke states “I believe that she is possibly um compromised, not by just Robert David Steele but by other parties that are foreign actors. Foreign nations.” At 42:03, Lutzke states “and she’s only getting trips

here to the US based on these fraudulent donations to this fraudulent UNRIG scam, and she knows its fraudulent.” At 43:36, Lutzke states “Everybody can go look at the UNRIG.net. We suggest you do it. We suggest you look at Robert David Steele’s UNRIG information. Look at all of it. We want everyone to do that, so you can see their whole drive is to get their hands on these corrupt Congressman and have them do this pledge”. At 45:12, Lutzke states “I feel that she’s [Cynthia McKinney] un-American”.

z. On or about August 26, 2017, Lutzke falsely stated on *Trello.com* that Robert did not author the NATO Open Source Intelligence Handbook. In truth, he wrote and is responsible for over eighty-five percent (85%) of the Handbook. As of September 1, 2017, Lutzke’s *Trello* posts were accessible by clicking the following hyperlink: <https://trello.com/b/aJuIdUqb/robert-david-steeles-claim-that-he-authored-the-nato-open-source-intelligence-handbook-is-refuted-by-general-kernan>. Lutzke’s “Trello board” has since been removed from the Internet.

aa. On August 30, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, “**Je Suis Queen Tut - Is Robert David Steele Running an Op Against George Webb & CSTT?**”. As of March 23, 2018, the video may be accessed by clicking: <https://www.youtube.com/watch?v=vIfBVDtCNlg>. Goodman and Lutzke appear together in the video. The video confirms that Goodman and Lutzke exchanged messages and collaborated prior to publication. The video features a photograph of Robert and Dr. McKinney with a circle and a line through the photo:



Goodman describes the video as follows: “The mighty Queen continues to call out the Robber David who Steals on his potentially fraudulent activities”. The video republishes, directly and by implication, some of the same statements about Robert and #UNRIG as were published in prior videos.

20. In addition to the false statements made by Goodman, Negron and Lutzke in the YouTube videos above, Goodman, Negron, Lutzke and their agents posted comments to videos uploaded on third-party YouTube channels. These comments repeated the same false, defamatory and hurtful words about Plaintiffs that Goodman, Negron and Lutzke used directly in the above videos.

B. *False and Defamatory Statements Since September 1, 2017*

21. After Plaintiffs commenced this action on September 1, 2017, Goodman and Lutzke escalated their attacks upon Plaintiffs. They increased the number of defamatory statements, the breadth of publication, and the ferocity of their defamation campaign. The unprovoked false and defamatory statements continue to this very day.

22. Between September 1, 2017 and December 25, 2017, Goodman and Lutzke continued to act together, in concert and in furtherance of the conspiracy to defame Plaintiffs, publishing the following false and defamatory statements and insulting words:

a. On September 6, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, **“Crushing Grip of the Deep State”**. As of March 23, 2018, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=Zo3TnUazpGQ&feature=youtu.be>. Goodman, Lutzke and others, including a voice represented by a picture of Lady Bird Johnson, appear together in the video:



At 1:27 of the video, Goodman states “We’re going to be talking about the deep state and it’s crushing grip, how it’s been exerting its force on the President of the United States, how it is operating through a variety of different apparatchiks if you will, including our personal favorite, Mr. Robert David Steele.” At 4:41, Lutzke states “you know he’s

running an operation, he has a team of people he works with and they continue to go after us ... and [CSTT] ... and try to discredit us, but here's one of the things that's come forward recently, there is now a taped interview that reveals that RDS was considered somewhat of a wacko [Goodman laughs] and was not really considered for any serious position on the libertarian election ... team". At 7:10, Goodman states "what we are proposing is that Robert David Steele is trying to fool everyone and that Robert David Steele is not in fact engaged in a campaign to execute election reform and Queen Tut you were one of the very first crowd source the truth community members to come forward with evidence. This is the key I know it's very difficult for Robert David Steele's thick skull and dense brain to absorb information. It's a side effect of being a total moron, but the fact is when you accuse someone of fraud and you present evidence of fraud that is called journalism; that is called exposing fraud when you make ridiculous claims and then publish lawsuits to the Internet and say things like I've filed a lawsuit when in fact you haven't that's called abuse of process". At 16:19, Joe Hudson states "Hey Jason ... I just want to make a quick statement ... [I]t sounds like you know how those people develop those Ponzi schemes with fake stocks [Goodman interjects, "right"] and the stock keeps going up and up and up, and it's not really a stock, it's not really even a company ... sounds like that's what RDS is doing".

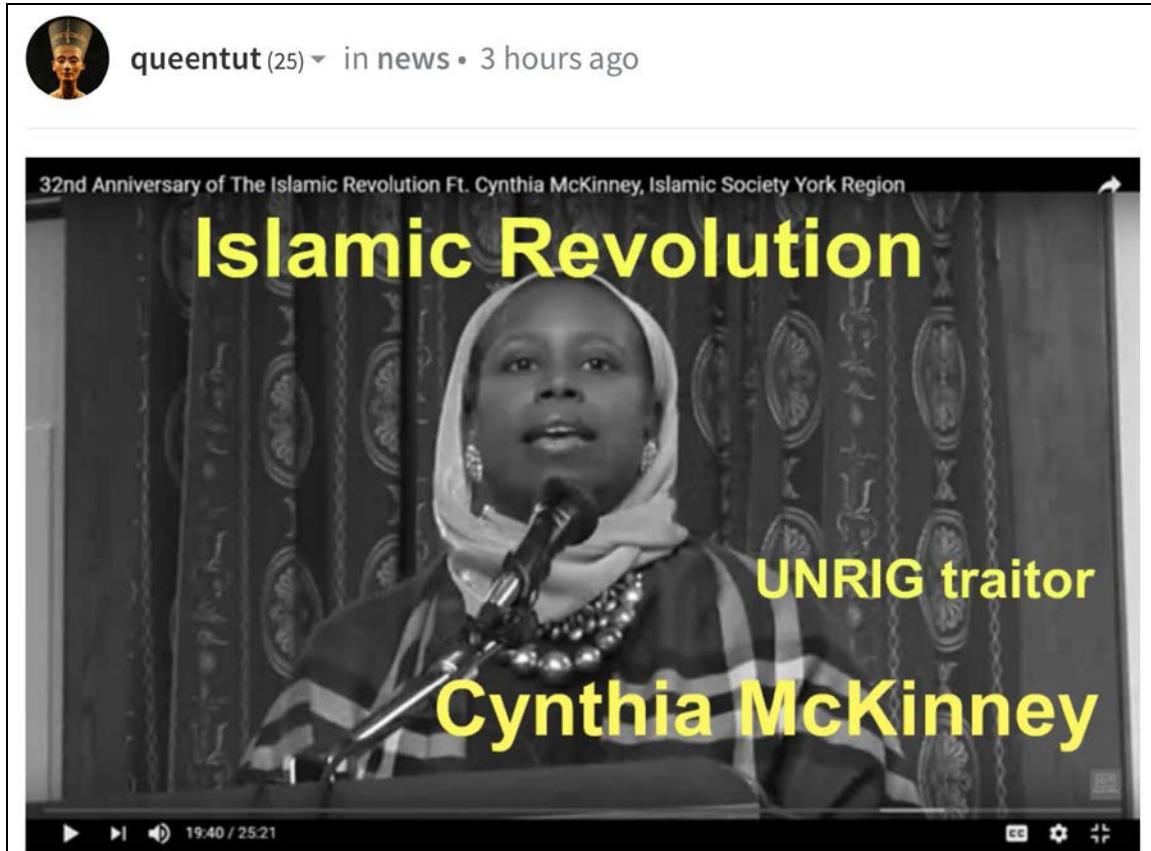
b. On September 11, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, "**#Unrig Espionage, Treason and Traitors in Congress**". As of March 23, 2018, the video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=Jxh2Qg84QWg&feature=youtu.be>. Goodman and Lutzke act together throughout the video to defame #UNRIG and Dr. McKinney:



The description of the video falsely accuses #UNRIG and Dr. McKinney of “espionage” and “treason”. At 5:10 of the video, Lutzke falsely accuses Dr. McKinney of being “absolutely tied into the Muslim Brotherhood”. At 5:47, Goodman states “now some of the things you’re saying are quite shocking and initially you know we had thought that Cynthia McKinney was simply being influenced by Robert David Steele”. At 8:51,

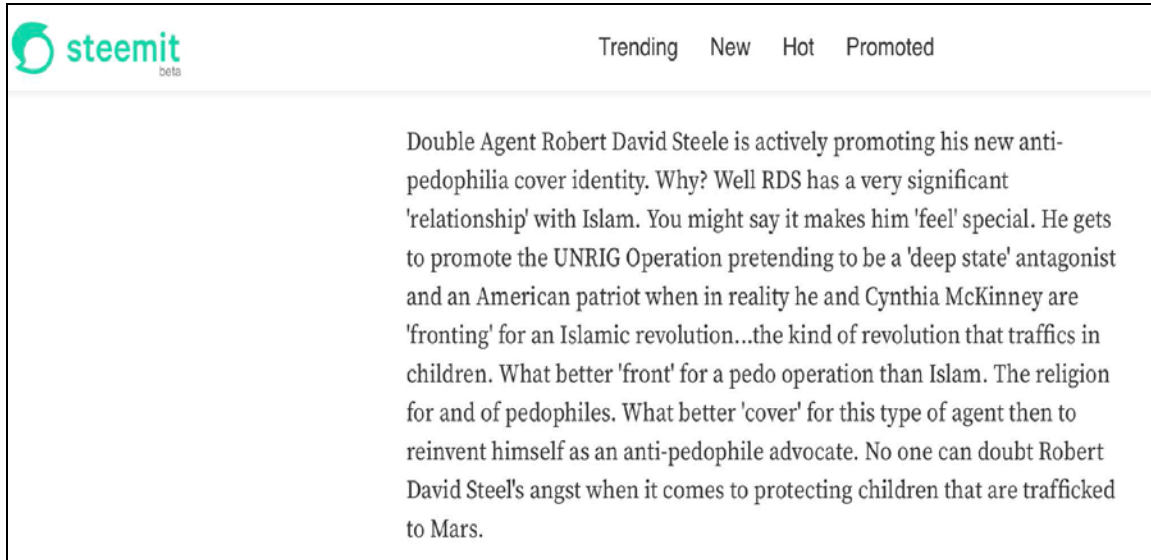
Lutzke states Dr. McKinney is “backed by a very powerful group called the Muslim Brotherhood”. At 12:12, Lutzke states that “everyone knows, if you’ve listened to any of the video interviews that I’ve done when Trish [Negron] and Jason were working together like you know a little while back, there was a video called the ‘UNRIG Cynthia McKinney’ and in that video I stated and made claims about the fact that I believe from all the research I was doing that Cynthia McKinney was compromised by foreign powers or foreign nationals.” At 17:36, Lutzke states Dr. McKinney is “funded by the Muslim Brotherhood... [S]he is very, very insidious because she comes across as the alt left using the people language the people language, but ultimately she is Islamic. She is part of the Muslim Brotherhood program and movement.” At 18:42, Lutzke states that “there is a jihad going on right now [and] Cynthia’s part of it. At 37:13, Lutzke states that “Cynthia McKinney is a perfect example of somebody who has been bought by the Muslim Brotherhood, and is now presenting this people’s platform and is trying to civilize people ... wanting people to see her as a civilized being, but involved in a jihadist process without saying it. She’s using our vehicles. She’s using our methods of fund-raising. She’s doing this fake unrigger campaign which is completely fake. They never went anywhere. Basically, it never happened”. At 37:56, Goodman states, “Queen Tut, let’s examine some of the financials for Robert David Steele’s Earth Intelligence Network ... [W]e’re learning quite a lot about how charlatans can take advantage of the various loopholes and just you know straight out commit fraud with these 501c3’s”. At 44:33, Goodman states that “Robert David Steele is constantly lying about the facts of everything that’s gone on from the time that he met us until today.”

c. Lutzke repeated her false and defamatory accusations of treason many times in 2018. On March 19, 2018, Lutzke continued the scandalous accusations of treason against Robert, Dr. McKinney and #UNRIG using Twitter and a “Steemit”¹¹ account. Lutzke doctored a photo of Congresswoman McKinney and inserted the following text, “UNRIG traitor”:



¹¹ “Steemit” is a new for-profit social media platform, where everyone gets paid to post online. [<https://steemit.com/steemit/@panenka/what-is-steemit-and-how-does-it-work>; <https://www.youtube.com/watch?v=Fn0m05A8vDE> (“What is Steemit”)]. Steemit pays the both content creator, when their work gets upvoted, as well as the people who curate the best content on the site by upvoting others work. Steemit is powered by blockchain technology and uses a new cryptocurrency to reward users who upload articles, images, commentary, etc. Every day, new units of the currency are created by the network and distributed to its users, who can exchange these digital currency units for actual real money. Unlike YouTube and Twitter, information posted by a user to Steemit is permanent. It cannot be removed from the Internet by the platform or the content creator. **Lutzke has found a way to defame Plaintiffs and get paid for her dirty work.**

On March 20, 2018, Lutzke published the following false and defamatory statements about Robert and #UNRIG in a blog on Steemit entitled, “Islam and Pedophilia: The UNRIG Revolution”:



And, on March 23, 2018, Lutzke tweeted the following false and defamatory statements:



d. On September 23, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, “**Unraveling the Deep State – Conspiracy to Suppress Free Speech**”. As of March 23, 2018, the video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=Zep-7jk0BLA&feature=youtu.be>. Throughout the long videos produced by Goodman and Lutzke, Goodman and Lutzke work together and in concert to defame and disparage Robert:



The video accuses Robert of engaging in a “conspiracy to suppress free speech”. At 21:45 of the video, Lutzke states, “Well Jason, this is the thing that we want everyone to understand, and a lot of people already understand ... these are the kind of people who come and listen to the truth that we put out, but this is a tactic it’s the same tactic used at the macro level that we’re talking about with Bezos DARPA CIA Washington Post it’s the same tactic that RDS is using to shut down Crowdsourcing the Truth ... RDS is a disinfo agent, once CIA never not CIA, you know, and he’s been actively doing everything he can to co-opt the truther movement on the Internet, and he came after ours, our group right away because guess what we were the ones who revealed his basic fraud that he’s been perpetuating for a number of years using this electoral reform act.” Goodman agrees with Lutzke. At 23:32, Goodman states that “Robert David Steele is

trying to reveal who Queen Tut is to prevent her from providing this evidence of fraud. People should be asking themselves why is he doing that? What is his purpose in doing that? Is it because he's an honest guy who wants to reveal the truth or is it because he is a deceptive fraudster allegedly who wants to trick people into thinking he's running a 501c3 that's going to create election reform when in fact all he's doing is trying to raise money so he can buy RVs so he can crash them and buy soft drinks and give gifts". At 24:40, Lutzke states that Robert David Steele "has filed this suit. He's using this suit ... he's improperly using legal institutions and the lawsuit is ... designed to discredit and defame and embarrass and ultimately harass ... us so that we will shut up. He wants us to shut up about his fraud." At 26:41, Goodman and Lutzke cast aspersion upon the Earth Intelligence Network. Goodman states "this is the Earth Intelligence Network, Robert David Steele's highly unintelligent business organization". At 36:03, Lutzke states that "Robert David Steele is improperly using legal institutions ... in retaliation and as a means of suppression to shut our channel down, to shut our ability to speak the truth and what he did with this document here [referring to *Document 12*] is he actually put an affidavit to the court, filed an affidavit ... stating that they have served you, Jason, which is completely false [Goodman agrees, stating "totally false"], not only false but right here we have the evidence in front of everybody else that this affidavit this summons has somebody on the summons that has nothing to do with the suit¹² so it's completely

¹² The Affidavit of Service on Goodman identifies the caption of the case as "Robert David Steele, ETANO v. Jason Goodman, ETAL". [*Document 12*]. Incredibly, Goodman and Lutzke thought the reference to "ETANO" was referring to a manufacturing company in Taipei, Taiwan. Lutzke opined that the reference to the Chinese company, "ETANO", "absolutely disqualifies the Summons from having any kind of legal weight or standing." [Video at 34:57]. Lutzke is not an attorney and her free unauthorized legal advice to Goodman is incorrect as a matter of law.

invalid [Jason Goodman responds, “right”], so he has taken an invalid summons and written affidavit to the court filed it to the court [Goodman laughing on screen], now I consider this some form of legal misconduct”. At 51:26, Goodman points at the screen and states that “I can tell him he’s a moron ... It’s not a crime to be a moron, but it is a sad condition unfortunately in Robert David Steele suffers from”. At 52:29, Lutzke states that “Robert David Steele is in a conspiracy to take down Crowdsourcing the Truth and he’s been involved in it for a ... while now ... Robert David Steele is a very nasty person and that man has done more for taking down really good people ... [W]e are going to make sure and we’ve already done a lot by exposing your numerous frauds and in my opinion you’re a person who needs to be put down [Goodman interjects: “legally speaking”] legally speaking absolutely legally speaking that you need to be put in a place where you can no longer affect human beings and be twisting people’s minds especially the naïve people who come on the Internet looking for truth. You’ve been twisting people’s minds for a very very long time and we want people to understand that this needs to stop and that you need to be stopped and that your association with the Muslim Brotherhood Cynthia McKinney and her funding by George Soros which we discovered recently there’s some ties going on here with Robert David Steele ... He is not a good guy.” At 55:06, Goodman states “I thought you were going to say Robert David Steele is a sociopath and it’s my opinion that he might well be that [Goodman chuckles]”.

e. On September 27, 2017, Goodman published a video on YouTube entitled, “Fireside Chat With What Big Eyes You Have”. As of March 23, 2018, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=sV3bY-4pj4Y&feature=youtu.be>. This video

features Goodman with yet another caricature as his “guest”. Goodman identifies the guest as “What Big Eyes You Have”. Goodman and the caricature work together and in concert to defame and disparage Robert:



At 36:43 of the video, Goodman states “[c]oincidentally, tortious interference is one of the things that Robert David Steele is suing me for so this is these guys taking a page right out of the book of all the crooks and criminals that we are trying to expose, whether it’s the Clinton Foundation and all of their felonious activity that I speak about every Sunday on Sunday with Charles with Charles Ortel or you know the very activities of Robert David Steele himself.” At 37:41, Goodman states that “this lawsuit is sort of the last-ditch effort of a tired old man who is finally being exposed for the alleged fraud that he is.”¹³

¹³ The reference to “Fyreside” in the title of the video is to the former employer of Manuel Chavez. After Mr. Chavez expressed support for Plaintiffs, Goodman and his agents repeatedly contacted Mr. Chavez’ employer and eventually got Mr. Chavez fired.

f. Many of the Goodman/Lutzke video productions promoted and encouraged violence against Plaintiffs. Goodman and Lutzke disclosed Robert's home address to their viewers and subscribers and used Google Maps to show a photo of Robert's home. On September 30, 2017, Goodman and Lutzke produced and published a video on YouTube entitled, **"#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals"**. As of March 23, 2018, the video may be accessed at: <https://www.youtube.com/watch?v=kYOikz5mjbw&feature=youtu.be>. Goodman and Lutzke knew that #UNRIG purchased an RV and that Robert and Congresswoman McKinney toured in the RV to promote the business of Earth Intelligence Network and the #UNRIG campaign. The Goodman/Lutzke video **"#fakelawsuit"** opens with a frightening still shot of an exploding RV:



Goodman and Lutzke work together and in concert in the video to defame and disparage Robert:

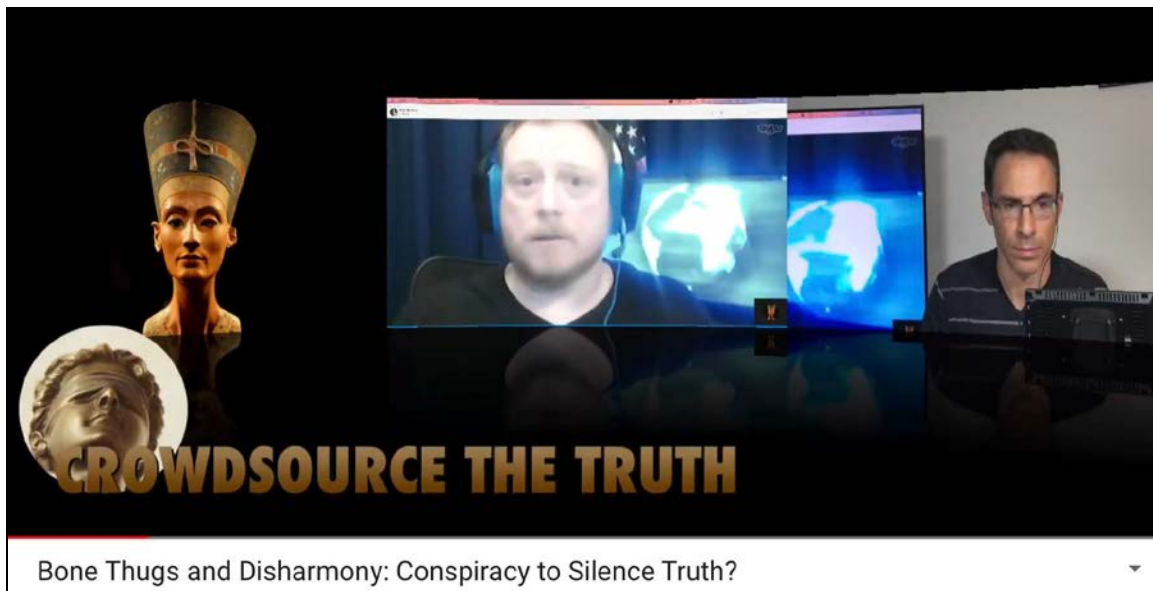


Goodman and Lutzke describe the video as follows: “Crowdsource the Truth addresses Robert David Steele's fraudulent 501c3 Earth Intelligence Network. His bully tactics are answered with a Rule 11 letter in what can only be qualified as a fake lawsuit from a real idiot.” In this video, Goodman and Lutzke discuss the lawsuit. At 0:56 of the video, Goodman states “it’s a threat. We’ve been threatened. I don’t know if it’s got any validity behind it. It’s an impotent threat and that’s why we’ve named this the impotent psychological warfare of the Robber David Who Steals”. At 1:20, Goodman tells Lutzke that “we’re going to detail this hashtag fake lawsuit of the fraudulent Robert David Steele and I say that with confidence now because we have very solid evidence of fraud”. At 6:36, Goodman reveals that “Queen Tut” is a “code name” that he gave Lutzke when she first contacted him in June 2017. At 7:20, Goodman claims that Robert David Steele was “changing things and trying to cover things [relating to his nomination for a Nobel Peace Prize] that he realizes were obviously or at least seemingly obviously fraudulent so that’s

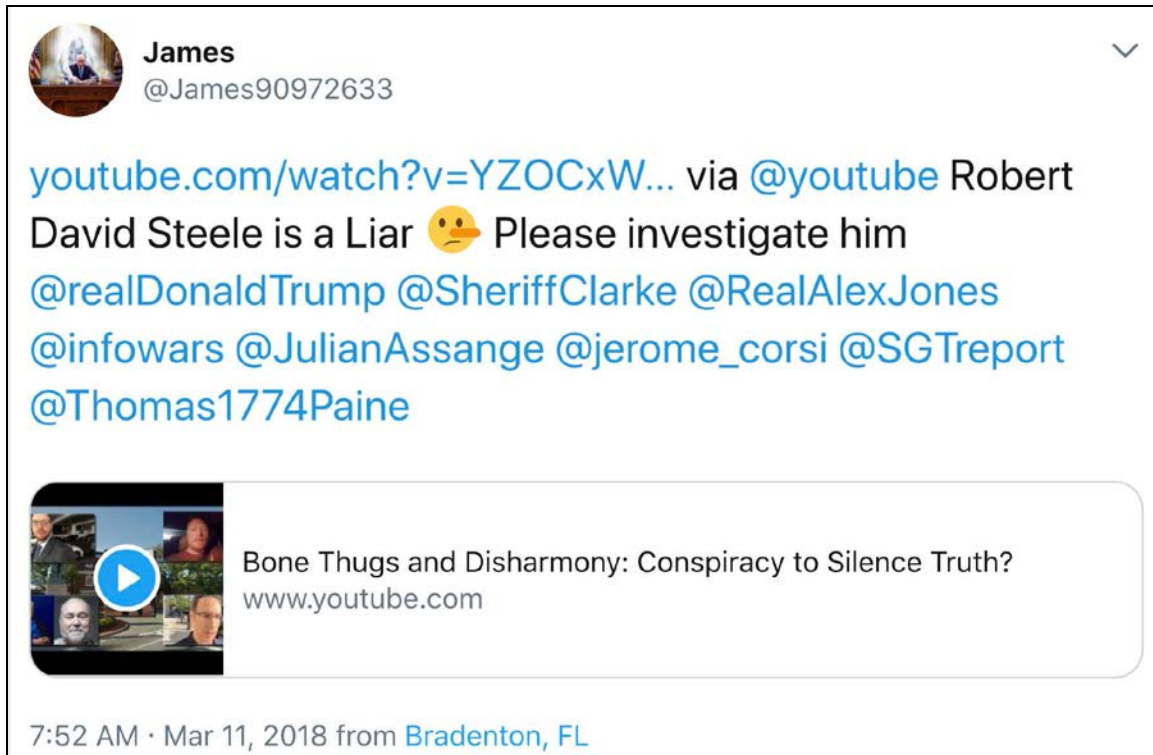
one thing right there.” At 8:47, Goodman calls Robert “Mr. Stupid”. At 30:23, Lutzke accused Plaintiffs of “charity fraud ... we’re going to go into the charity fraud related to the Earth Intelligence Network”. At 39:54, Goodman claims that Negron is no longer appears in videos “because of scheduling and other reasons”. At 45:12, Goodman states that “if you are going to solicit money, charitable contributions as Robert David Steele did when he came on to Crowdsorce the Truth and said he wanted to raise two hundred and fifty thousand for his fraudulent election reform campaign in which he told us and said on the Internet and in various interviews that he was going to have Rand Paul draft a bill that was going to become an act that would be this Election Reform Act, but we now know that that never happened and that there was not enough time available in the time that was you know at the time he was making that ask but he was soliciting those funds there was not sufficient time for that to even happen so that was fraudulent”. At 52:42, Lutzke parrots Goodman and states “there is charity fraud here okay that’s a fact”. At 54:30, Goodman states that “we’re bringing this information forward because if someone tries to take a tax deduction on their donation to the Earth Intelligence Network, they themselves could be in legal jeopardy – you should consult your accountant and an attorney before you try to take a tax deduction on any donation made to this fraudulent 501c3. This is a public service announcement to members of the crowdsorce community who have been victims of fraud – fraud executed by Robert David Steele”.

g. On October 7, 2017, Goodman and Lutzke published a video on YouTube entitled, “**Bone Thugs and Disharmony: Conspiracy to Silence Truth?**”. As of March 23, 2018, the video may be accessed by clicking the following link:

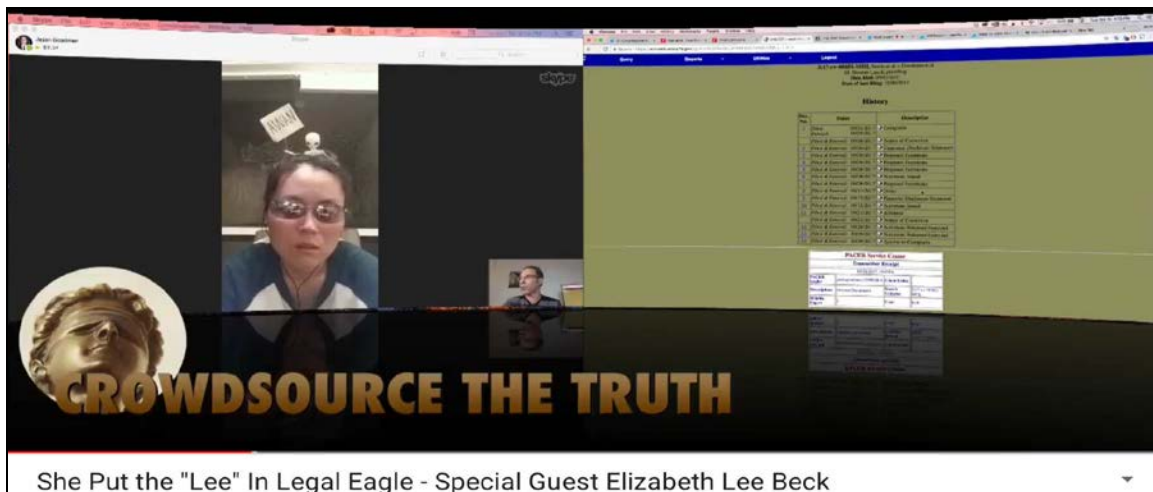
<https://www.youtube.com/watch?v=YZOCxWlyqBA&feature=youtu.be>. Goodman and Lutzke are again featured together, acting in concert:



The video is a completely false and insulting attack upon Plaintiffs and their counsel. At 54:20 of the video, Goodman states “we got idiots like Robert David Steele coming out and saying that nobody was shot [in Las Vegas]. I mean, come on. This is my opinion, but he’s a dumb guy. [Pointing at the screen]. Robert David Steele, you’re a dumb guy”. At 1:01:58, Goodman states that “I’m happy to allow it [the lawsuit] to go forward because I think what it’s going to expose ... what I believe to be charity fraud and tax fraud”. Goodman and Lutzke’s false statements had a definite negative impact on Plaintiffs’ name and reputation. Viewers of the videos believed Goodman and Lutzke and many times repeated the insulting words Goodman and Lutzke had used. For instance, Twitter account “@James90972633”, a self-described “US Air-Force veteran, husband, father of 4, praying for America and President Trump, exposing corruption” with 325 Twitter followers, tweeted the following in response to Goodman and Lutzke’s “**Bone Thugs**” video:



h. On October 10, 2017, Goodman published a video on YouTube entitled, “**She Put the ‘Lee’ In Legal Eagle – Special Guest Elizabeth Lee Beck**”. As of March 23, 2018, the video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=8xCq0bMF0HI&feature=youtu.be>. In this video, Goodman attempted to engage attorney, Elizabeth Lee Beck, in a discussion about this case. Goodman displays the PACER case history:



At 13:24 of the video, Goodman states “I don’t know if you’re aware of this lawsuit that’s been brought against myself and Patricia Negron and Queen Tut or a woman known as Queen Tut ... I’ve come familiarized with PACER. People who have been listening to the nonsense and shenanigans of Robert David Steele, they can check out this newest entry on PACER in the docket here which is the answer that we filed with the court”. At 14:07, Goodman states “the reason I bring this up is not to publicize the hashtag fake lawsuit from a hashtag real idiot”. At 16:28, Goodman states that “in this particular case, what happened was Robert David Steele came on our show and he was trying to raise two hundred and fifty thousand dollars for his UNRIG campaign. Now, he then did a bunch of things that were dishonest which led me to believe that he might possibly be raising this money in a fraudulent manner based on other things that I saw him doing and evidence that people started bringing forward and we just you know as a news organization started publishing people’s testimony and presenting people’s evidence that indicated that Robert David Steele had a pattern and practice of committing fraud”.

i. Throughout their video productions, Goodman and Lutzke used Robert’s name and picture for purposes of advertising the business of CSTT and for the purpose of trade – generating substantial business for CSTT (*i.e., merchandise sales, donations, increased subscribership, monetization of CSTT’s YouTube Channel, and “Steem” (Steemit cryptocurrency) for Lutzke*). Robert was never asked and never consented to the Defendants’ use of his name or picture for any reason. On November 27, 2017, Goodman published a video on YouTube entitled, “**Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response**”. As of March 23, 2018, the

video may be accessed by clicking the following hyperlink:

<https://www.youtube.com/watch?v=GNxCk6nqFJg&feature=youtu.be>. The video opens

with the following insulting picture and words:¹⁴

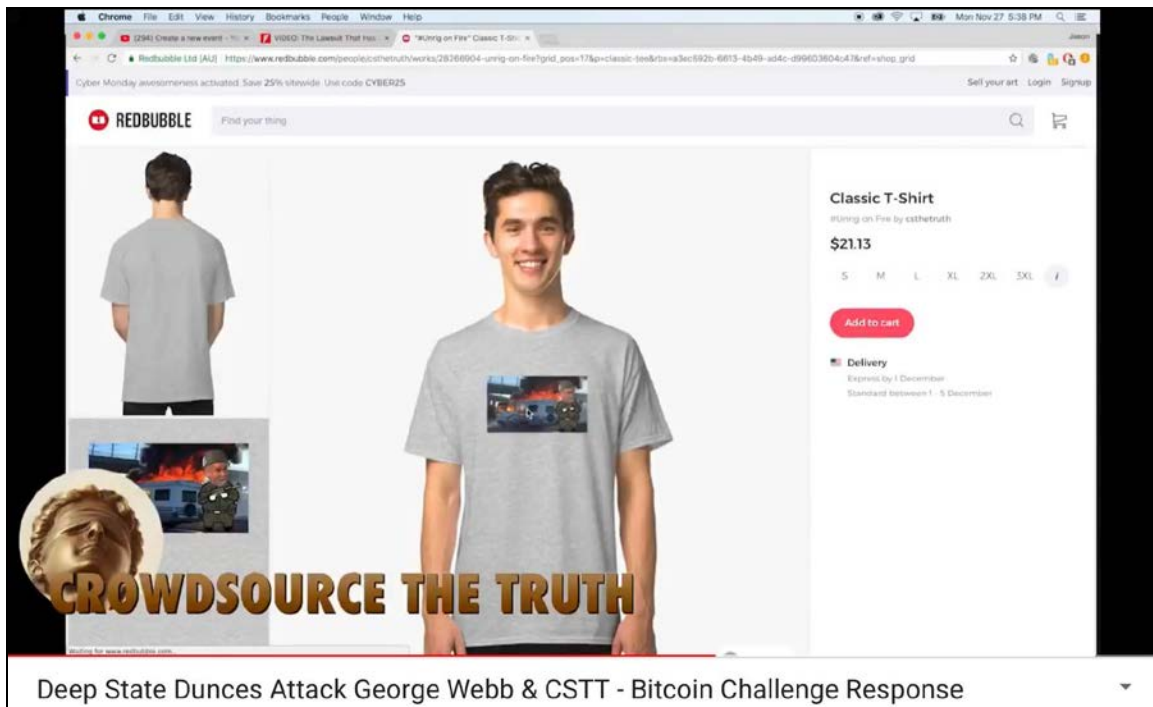


At 14:20 of the video, Goodman reveals that “Red Bubble¹⁵ is the website that all the Crowdsources the Truth merchandise is available on ... and all the deep state idiots, everybody’s favorite real idiot who is mounting a fake lawsuit”. At 14:45 of the video, Goodman goes on a verbal tirade in which he claims that it is his First Amendment right to “express my opinion that a Robber Who Steals is a [sic] IDIOT, such a dummy, such a

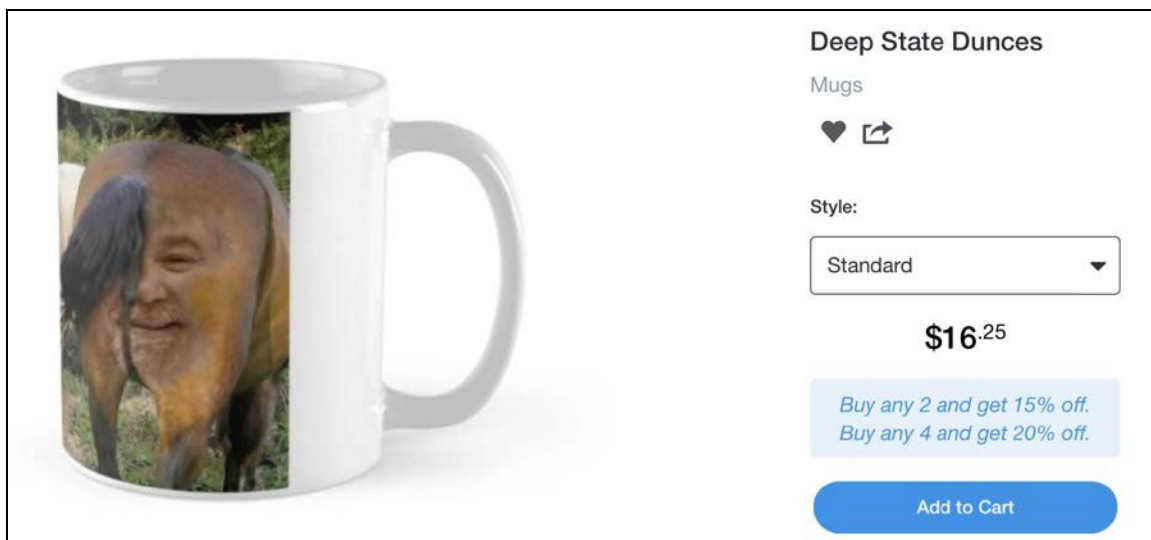
¹⁴ The other persons depicted in the picture are Manuel Chavez (the pig) and Dave Acton (in the straight-jacket). Dave Acton a/k/a David Sweigert is the brother of George Webb. [<https://steemit.com/youtube/@reallygraceful/navigating-the-tangled-webb-or-part-one-george-webb-and-dave-acton-reveal-they-re-brothers>]. “George Webb” is an individual who appears with Goodman and Negron in several of the videos at issue in this action.

¹⁵ “Red Bubble” is a website that advertises for sale products that are designed by “independent artists”. CSTT advertises and sells merchandise through Red Bubble. [https://www.redbubble.com/shop/crowdsources?ref=search_box].

loser, and you know what, losers lose, that's what they do." The **"Deep State Dunces"** video shows Goodman and CSTT using Robert's picture on t-shirts:



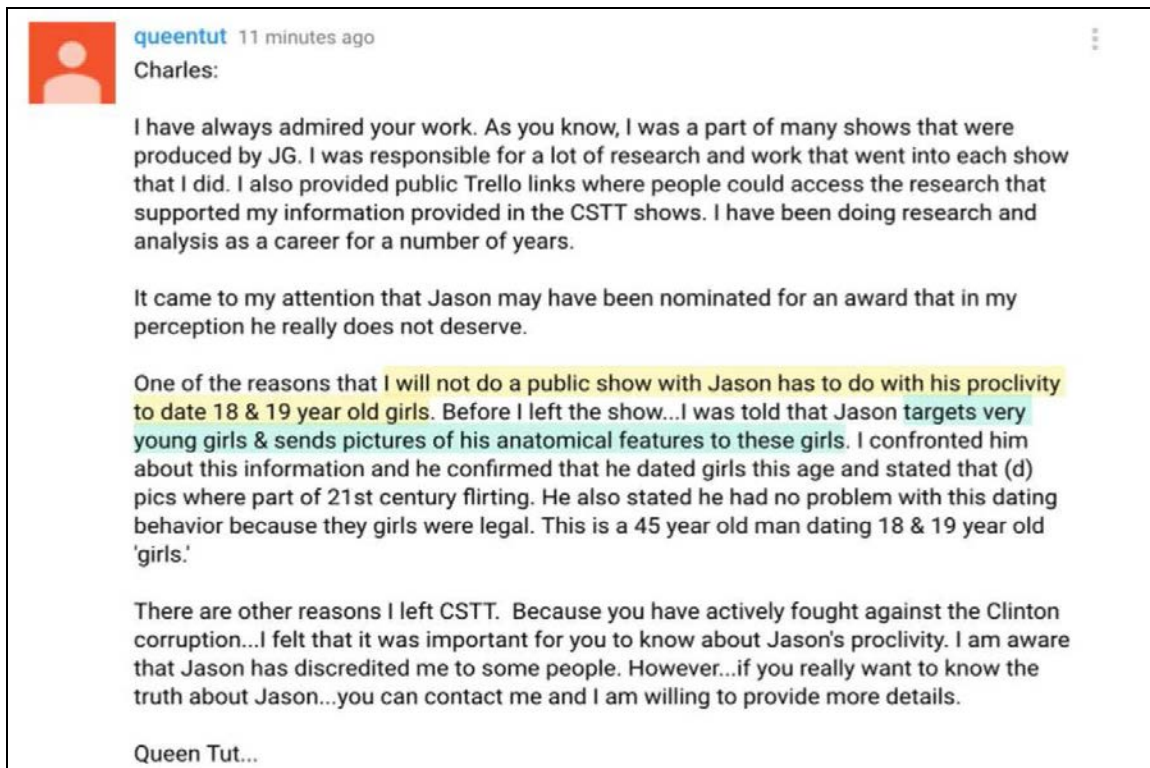
A review of the Red Bubble website also shows that Goodman and CSTT are selling coffee mugs with Robert's picture on them:



Robert never consented to Goodman's use of his picture for purpose of advertising and/or trade.

23. The conspiracy between Goodman and Lutzke appeared to end in or about December 2017.

24. On December 27, 2017, the “Hoax Wars” YouTube channel published a video entitled, “**The Queen Tut Tapes #1: Trish Has Spent \$8,000 Defending RDS Lawsuit**”. [<https://www.youtube.com/watch?v=h0f036n2Slo>].¹⁶ During the video, the following comment from Queen Tut was displayed:



25. Despite the appearance that Goodman and Lutzke have parted ways, their efforts to defame Plaintiffs continue.

26. Goodman continues to publish YouTube videos (republished to Twitter) about the Plaintiffs.

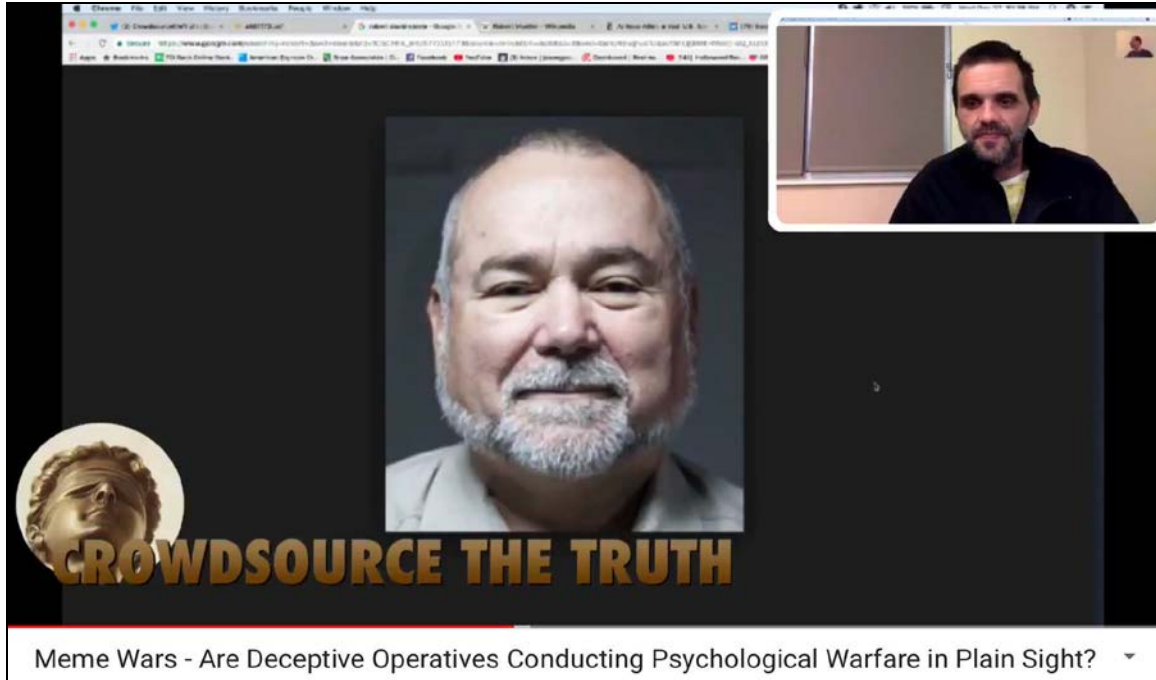
¹⁶ On or about March 14, 2018, YouTube deleted virtually all the videos posted on the Hoax Wars YouTube Channel. On or about March 23, 2018, the “Hoax Wars” YouTube channel was terminated by YouTube because of “multiple third-party claims of copyright infringement regarding material the user posted.” The “third-party” who claimed copyright infringement was Goodman.

27. On December 25, 2017 at 9:46 p.m., Lutzke created a Twitter account, “@Queentutnairobi”. [<https://twitter.com/queentutnairobi?lang=en>]. Lutzke now uses Twitter to publish false and defamatory statements about Plaintiffs. Lutzke also used the anonymous “Hoax Wars” YouTube channel, before it was terminated by YouTube, https://www.youtube.com/channel/UCf9d5SjqW_ARQeT96AH4RSQ, to make and publish false and defamatory statements about the Plaintiffs.

C. False and Defamatory Statements Since December 25, 2017

28. Since December 25, 2017, Goodman and Lutzke have published false and defamatory statements about Plaintiffs in multiple videos uploaded to YouTube, including the following:

a. On December 27, 2017, Goodman published a video on YouTube entitled, “**Meme Wars – Are Deceptive Operatives Conducting Psychological Warfare in Plain Sight?**”. As of March 23, 2018, the video may be accessed by clicking: <https://www.youtube.com/watch?v=8Tdkawt5FNU&feature=youtu.be>. In the “**Meme Wars**” video, Goodman positively identifies Susan Lutzke as “Queen Tut”. At 28:03 of the video, Goodman states “we do know someone else, who is a Marine, don’t we [referring to Robert], or he was a Marine at some point. I think his current occupation is, um, idiot, if I’m not mistaken. Who am I thinking of oh yes, oh yes. I know it’s this guy, here he is. So, he might be familiar with the strategy and tactics of the Marines”. As he makes these statements in the “**Meme Wars**” video, Goodman displays Robert’s picture as follows:



b. On December 27, 2017, Lutzke made statements about this action in a “Hoax Wars” YouTube video entitled, **“The Queen Tut Tapes #1: Trish Has Spent \$8,000 Defending RDS Lawsuit”**. Prior to March 14, 2018, the video was removed from the Internet because it violated YouTube’s Community Guidelines. [\[https://www.youtube.com/watch?v=h0f036n2Slo&feature=youtu.be\]](https://www.youtube.com/watch?v=h0f036n2Slo&feature=youtu.be). The video remains published on the video content sharing and hosting platform, BitChute.com. [\[https://www.bitchute.com/video/Rp7qjILuIHga/\]](https://www.bitchute.com/video/Rp7qjILuIHga/). The video features Goodman, Negron and Lutzke together as follows:



Beginning at 1:22 of the video, Lutzke states that “I’m waiting for Steven Biss to go forward and do any kind of action against Queen Tut ... Because as soon as he does that I will file a complaint with the Virginia State Bar and I will have his license again, okay”. At 2:12, Lutzke states “here’s the nasty part of this whole thing Trish has spent thousands of dollars on an attorney because each one of these suits ... they’re individual even though we’re all claimed in it”. Lutzke and Negrón remain in close contact. As evidenced by Negrón’s tweets, Negrón continues to be involved in Lutzke’s wholesale defamation of Plaintiffs. On March 23, 2018, for instance, Negrón notified one of her Twitter followers that Lutzke had all the “research” on Plaintiffs “organized”.

c. On February 13, 2018, Goodman published a video on YouTube entitled, “**Kevin Shipp – CIA Whistleblower**”. As of March 23, 2018, the video may be accessed at: <https://www.youtube.com/watch?v=uvjrCJoF6pk&feature=youtu.be>. At 30:22 of the video, the guest (Kevin Shipp) states “that's why whenever the Washington Post says they have sources and they won't say who they are, its CIA disinformation

without a doubt.” At 30:29, Goodman states “well I certainly can’t immediately think of anyone like that who might be lying about things constantly and you know spreading disinformation”. Goodman’s statement is of and concerning Robert. As Goodman makes this statement, he displays the following image on screen:



d. On February 23, 2018, Lutzke made statements about Plaintiffs in a “Hoax Wars” YouTube video entitled, “**Queen Tut Interview II**”. YouTube removed the video from its site prior to March 14, 2018 because the video violated YouTube’s Community Guidelines and Terms of Service. [\[https://www.youtube.com/watch?v=e3PX1vYUrA8&feature=youtu.be\]](https://www.youtube.com/watch?v=e3PX1vYUrA8&feature=youtu.be). Fortunately, Plaintiffs preserved the video using online video editor, WeVideo.com. [\[https://www.wevideo.com/view/1099204802\]](https://www.wevideo.com/view/1099204802). At 3:37 of the video, Lutzke states that “when you listen to RDS that he’s a bit of a buffoon ... after you’ve heard him and listen to him a number of times and how many times he flips a story even in the context of the same interview, you begin to catch on that this guy is ... not playing with a full deck either unconsciously or intentionally. I’m tending to believe intentionally ... and I

believe the lawsuit was part of this.” At 4:35, Lutzke states that “I’ve been putting the pieces together for a while. It started with the UNRIG campaign, okay, that’s where all this stuff started is that I bought [sic] information on to crowdsourcethetruth that blew apart his whole UNRIG campaign because it was a scam he’d been operating for six or seven years”. At 5:09, Lutzke states that “RDS has some very, very close ties to a KGB general, one who actually has worked with the CIA ... This KGB general, by the way, was a head of foreign intelligence in Russia for many, many years. He’s written a review on the back of Robert David Steele’s book ... Robert David Steele is very, very connected to international intelligence groups. He says he’s a CIA agent or ex CIA agent. I believe he’s still very active and I believe that’s basically what he’s doing in all these shows, where he basically coops information from everybody in the truth movement, spins it, puts it out in articles [and] interviews and he tries to make himself be the forefront of all this information, when basically he’s plagiarized and stolen it from everybody else.” At 11:47, Lutzke states that “I now understand that UNRIG was not just a scam, it was an operation and I call it Operation UNRIG now.” At 32:10, Lutzke claims that she was “fully aware of how RDS operates because I worked in anti-corruption for many years and I’m aware of the kind of strategies that the bad guys use, okay, to manipulate and silence people. I was involved in that very heavily for a long period of time, and so, when this court case was filed I knew I was not going to respond to it because first of all they had to serve me, okay... and [second] I knew that they were just going to try and flush Queen Tut out ... and ... create this chaos in people’s lives. That’s what RDS was trying to do.” At 40:43 of the video, Lutzke misrepresents that she is “not Susan Lutzke ... In fact, I have sent my birth certificate to the court about four or five days ago, and it

is now published on the court in the court documents who I am, okay, it is now in the court documents. I have seen it now.” At 41:21, Lutzke states that “[t]hese are criminals ... doing criminal activities, thinking they were going to get away with it, okay, thinking they could intimidate because intimidation is part of active measures but by waiting which is what I did intentionally I gave them enough rope to hang themselves and that’s a strategic way to deal with bad guys.”

e. On March 5, 2018, Goodman published a video on YouTube entitled, “**Ole Dammegard & Cody Snodgres – False Flags Pattern Recognition from JFK to Parkland School Shooting**”. As of March 23, 2018, the video may be accessed at: <https://www.youtube.com/watch?v=qDc9e790hAg&feature=youtu.be>. At 10:42 of the video, Goodman states “there’s a lot of people who always question anytime we have someone come forward and say they used to work with the CIA, the tendency is to question that of course. We’ve seen buffoons like Robert David Steele, who people tell me actually did work for the CIA, but he seems to be running a number of frauds. I’ve pointed to evidence where he’s doing charity fraud. How do we know when someone’s being honest about their clandestine background versus remaining a part of clandestine operations, who might be trying to – and I’m not suggesting that you’re doing this [referring to the guests] – but someone like Robert David Steele who seems to be trying to infiltrate this truth-seeking community”.

f. On March 15, 2018, Goodman published a video on YouTube entitled, “**Truth vs Lies**”. As of March 23, 2018, the video may be accessed at: <https://www.youtube.com/watch?v=bAuz0Gjev2M&feature=youtu.be>. At 27:35 of the video, Goodman states “Like Joe, when I tell you and the rest of the people in the

crowdsource community that Robert David Steele is a fraud I say that because I have evidence that he's committed charity fraud". At 35:18, Goodman states "[a]m I lying Joe? Have I fabricated this information with the specific intent of defaming this robber who steals. This fraud [pointing at and referring to Robert]." Goodman forcibly points at the screen:



Goodman continues the rant about Robert. He states "this tiny man who goes on the Internet and deliberately lies, okay. Robert David Steele is also fundamentally a fraud because he behaves in a consistently fraudulent way". At 37:09, Goodman calls Robert a "lying miscreant". At 39:16, Goodman states "I want evidence from Pro Publica to show that this guy's a liar [points to Robert on screen in background] and you know the other thing that's very interesting about that lawsuit Joe is the involvement of Susan Lutzke, also a liar known as Queen Tut". At 39:55, Goodman states "Joe, I'm going to ask you something ... Susan Lutzke sometimes she goes by Susan Holmes. On this program, she

went by 'Queen Tut'. You shared with me that Susan Lutzke had called you up and she even told people on a spoof hoax broadcast that she called you up according to her I was going down in flames and she was trying to save you. Now she called you up Joe what did she tell you in that phone call? At 40:32 of the video, guest, Joe Napoli, replies "she called me up on a Sunday, blocked her number, ... asked me a question did you know that Jason was dating underage girls and you know the pictures and so forth."

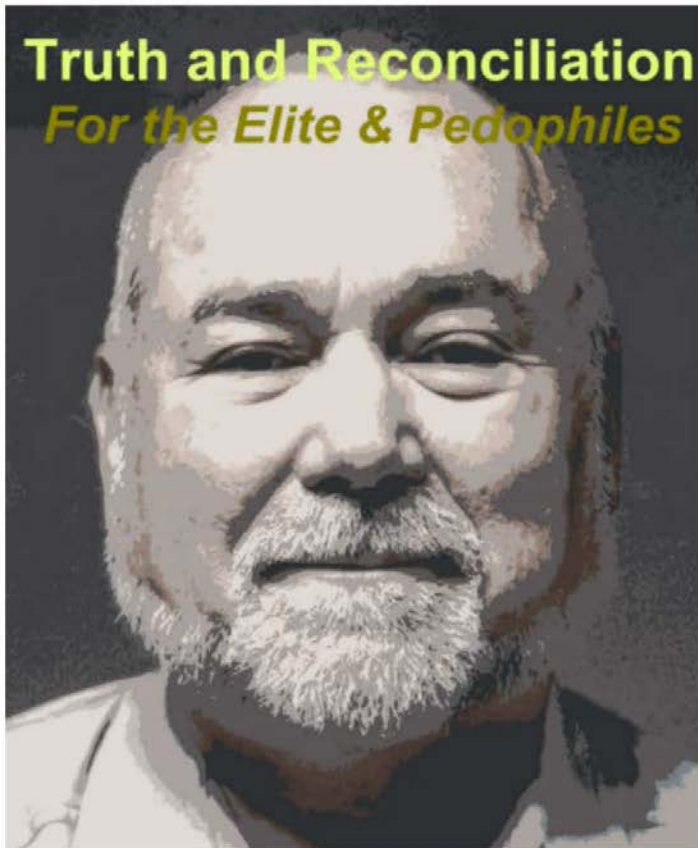
29. In addition to the YouTube videos identified elsewhere in this Amended Complaint, Lutzke has repeatedly used Twitter and Steemit since December 25, 2017 to defame Plaintiffs. The frequency of Lutzke's defamation has increased dramatically. Lutzke is posting false statements and odious and offensive comments about Plaintiffs virtually every day now on multiple social media platform. The false statements and insulting words chosen and used by Lutzke are especially egregious. Whereas prior to December 25, 2017, Lutzke employed defamatory words such as "fraud", "scam", "steal", and "liar" to impugn Plaintiffs, she has now escalated the falsehoods to and include accusations that Robert protects pedophiles, defends child traffickers, wants JIHAD in the United States, has committed "espionage" and "treason", and etc. On March 6, 2018, for instance, Lutzke tweeted the following statement:



Lutzke not only publishes false and defamatory statements and insulting words, but, like Goodman, she uses Robert's picture for purposes of her trade (blogging on Steemit) without Robert's consent. Lutzke has access to one or computers, and she is using a computer in interstate commerce to trespass and harass Plaintiffs. Lutzke's various tweets and blogs demonstrate that she is sophisticated, obsessive and compulsive. One of Lutzke's latest Steemit blogs (March 21, 2018) includes the following statements:

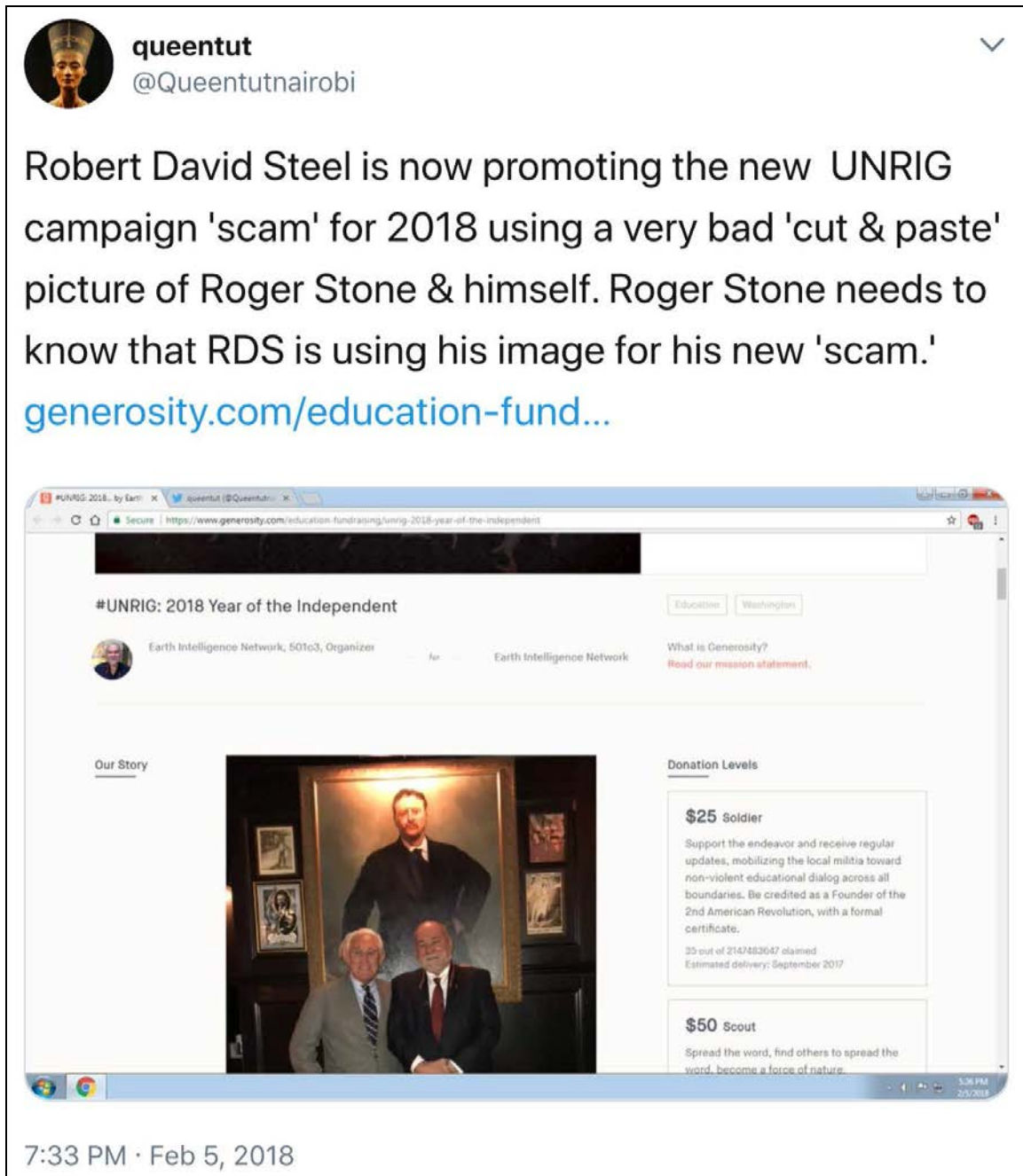
Double Agent Robert David Steele is running a major propaganda/ pederotector operation for Islamic Foreign Nationals and elements of the Deep State.

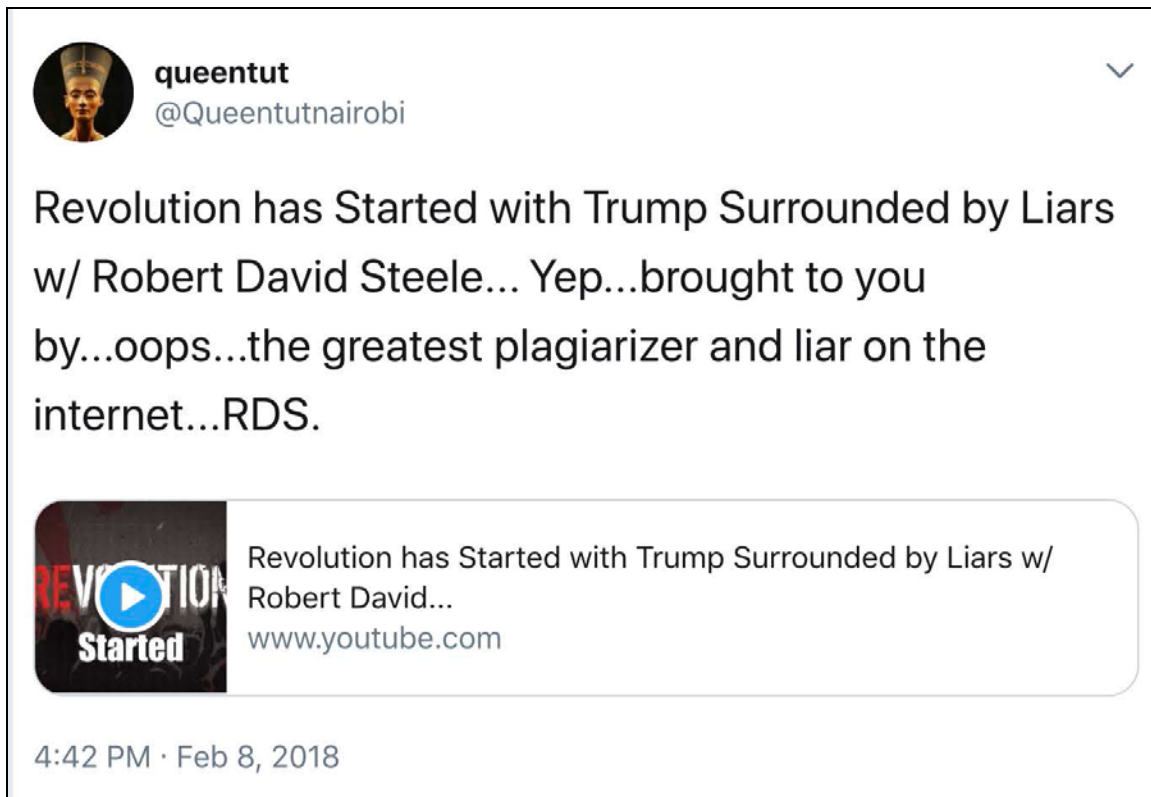
Once CIA...Always CIA



The Search for Truth: brought to you by Queen Tut:

30. In addition to false and defamatory statements and insulting words by Lutzke identified elsewhere in this Amended Complaint, between January 1, 2018 and March 25, 2018, Lutzke tweeted (published) and retweeted (republished) the following false and defamatory statements about Plaintiffs:







queentut
@Queentutnairobi



Queen Tut: Doing a 'live' interview with Hoax Wars on Friday 2/23. There will be breaking news about the RDS law suit. RDS has become 'the canary in the mine' for CIA internet disinfo. His NAZI/STASI 'lists' reveal that he is an agent: Pakistani, Chinese, Russian...Deep State.



1:50 PM · Feb 22, 2018



@Queentutnairobi

John Brennan, CIA

Islam pedophile religion: Weaponized to facilitate the DEEP STATE...

youtube.com/watch?v=0YpzOK...



81



queentut
@Queentutnairobi



Replying to [@TrishaDishes](#)

Many months ago I thought I was just revealing an UNRIG 'scam.' The fake federal law suit was supposed to silence us... because it's so much b-i-g-g-e-r than anyone realized. RDS is the tip of the iceberg. The law suit is a threat from the deep state: 15 million dollars=pedo op

3:02 PM · Mar 21, 2018



queentut
@Queentutnairobi



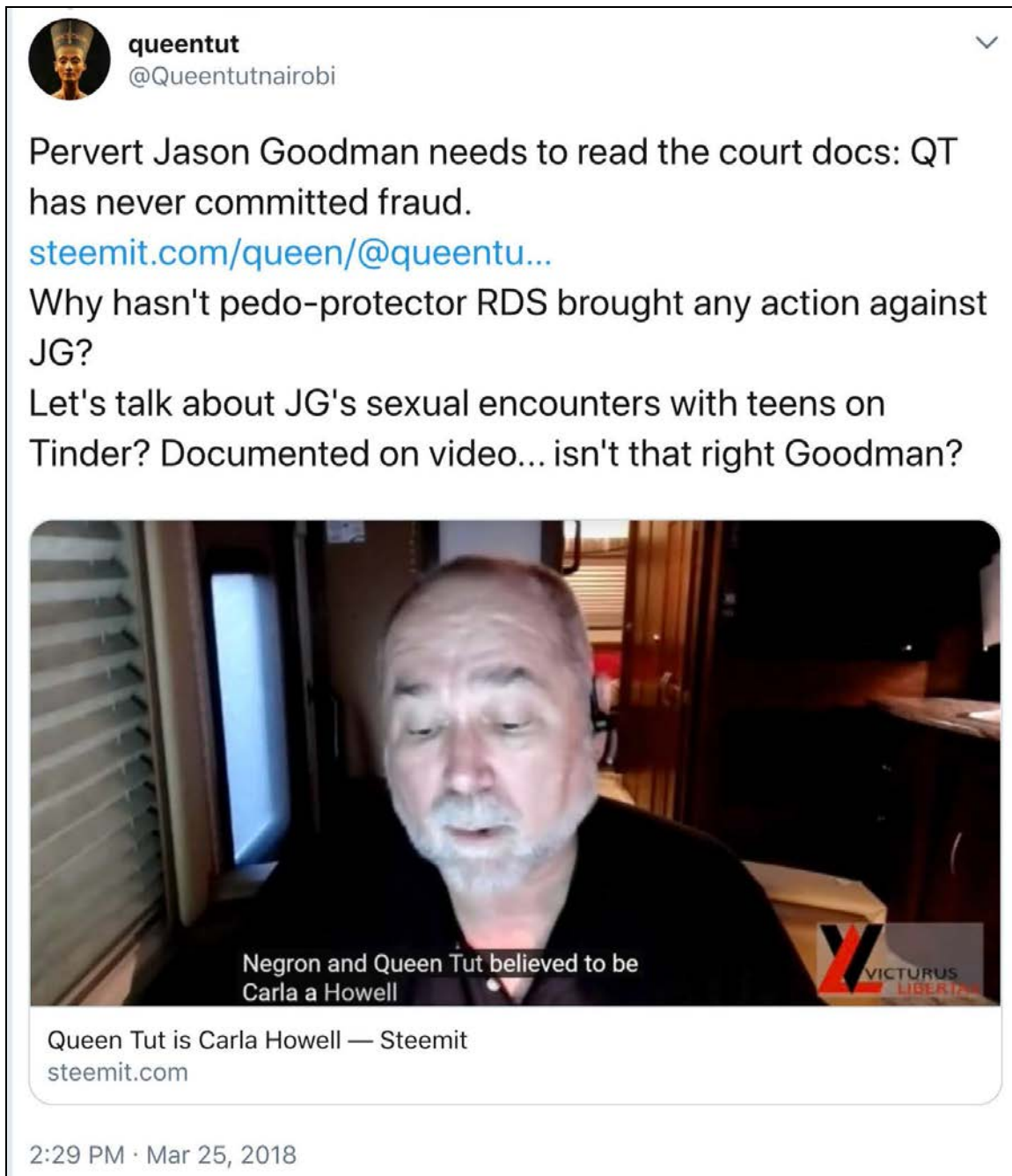
A 15 Million dollar federal lawsuit was suppose to silence [#TrishtheDish](#) and Queen Tut. Why 15 million dollars? Isn't that overkill? Yep...pedo- ops area big deal.

queentut @Queentutnairobi

Replying to [@TrishaDishes](#)

Many months ago I thought I was just revealing an UNRIG 'scam.' The fake federal law suit was supposed to silence us... because it's so much b-i-g-g-e-r than anyone realized. RDS is the tip of the iceberg. The law suit is a threat from the deep state: 15 million dollars=pedo op

3:15 PM · Mar 21, 2018



31. Goodman, Negron and Lutzke's false and defamatory statements have devastated Robert and have destroyed the business of the Earth Intelligence Network. Goodman, Negron and Lutzke's statements cast aspersion on Plaintiffs' honesty, prestige or standing in their field of business. Robert's honor has been stolen. His name and reputation have been publicly impugned, across YouTube, Twitter, and permanently

injured on and through Steemit. Robert has been attacked and discredited on every YouTube channel, where he was once popular, to the point that most hosts are not inviting Robert back. Those hosts that know Robert well have been forced to delete and ban hundreds of disparaging remarks by Goodman, Negron, Lutzke and their agents and followers, or turn off comments altogether, which has hurt Robert and various communities that valued how Robert would engage within the comments section after each interview, often answering questions and providing links where the interested party could learn more. Plaintiffs have suffered both presumed and actual damages, including loss and injury to business, insult including pain, embarrassment, humiliation, and mental suffering, injury to reputation, and out-of-pocket loss. At a financial level, Plaintiffs lost sponsors and were forced to refund donations because of Defendants' false claims of "fraud", "stealing", "scam", etc. Donations to the #UNRIG campaign prior to Defendants' defamation totaled over \$29,200 per month and were trending higher. Because of Defendants' defamation and insulting words, monthly donations to Earth Intelligence Network's business dwindled to around \$200 by November 2017.

COUNT I – DEFAMATION *PER SE*

32. Plaintiffs restate paragraphs 1 through 31 of this Amended Complaint and incorporate them herein by reference.

33. Goodman, Negron and Lutzke published and republished to third-parties – including, without limitation, CSTT YouTube subscribers, Goodman's followers on Twitter (@csthetruth), CSTT's Facebook followers, patrons of CSTT on Patreon, and authors and other "Steemers" on Steemit – numerous false factual statements, which are detailed verbatim above, of or concerning Plaintiffs.

34. By publishing YouTube videos, tweets, retweets and blogs on the Internet and by soliciting comments from third-parties, Goodman, Negron and Lutzke knew or should have known that their defamatory statements would be republished over and over by third-parties to Plaintiffs' detriment. Republication by both identified subscribers, users, patrons and Steemers, and anonymous persons was the natural and probable consequence of Goodman, Negron and Lutzke's actions and was actually and/or presumptively authorized Goodman, Negron and Lutzke. In addition to the original publications, Goodman, Negron and Lutzke are liable for the republication of the false and defamatory statements by third-parties under the doctrine announced by the Supreme Court of Virginia in *Weaver v. Home Beneficial Co.*, 199 Va. 196, 200, 98 S.E.2d 687 (1957) ("where the words declared on are slanderous per se their repetition by others is the natural and probable result of the original slander.").

35. Goodman, Negron and Lutzke's false statements constitute defamation *per se*. The statements accuse and impute to Plaintiffs the commission of numerous crimes involving moral turpitude and for which Plaintiffs may be punished and imprisoned in a state or federal institution. The statements impute to Plaintiffs an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or employment. Goodman, Negron and Lutzke's statements also prejudice Plaintiffs in their profession or trade.

36. Goodman, Negron and Lutzke's false statements have permanently and irreparably harmed Plaintiffs and their reputations.

37. Goodman, Negron and Lutzke acted with actual malice and reckless disregard for the truth for the following reasons:

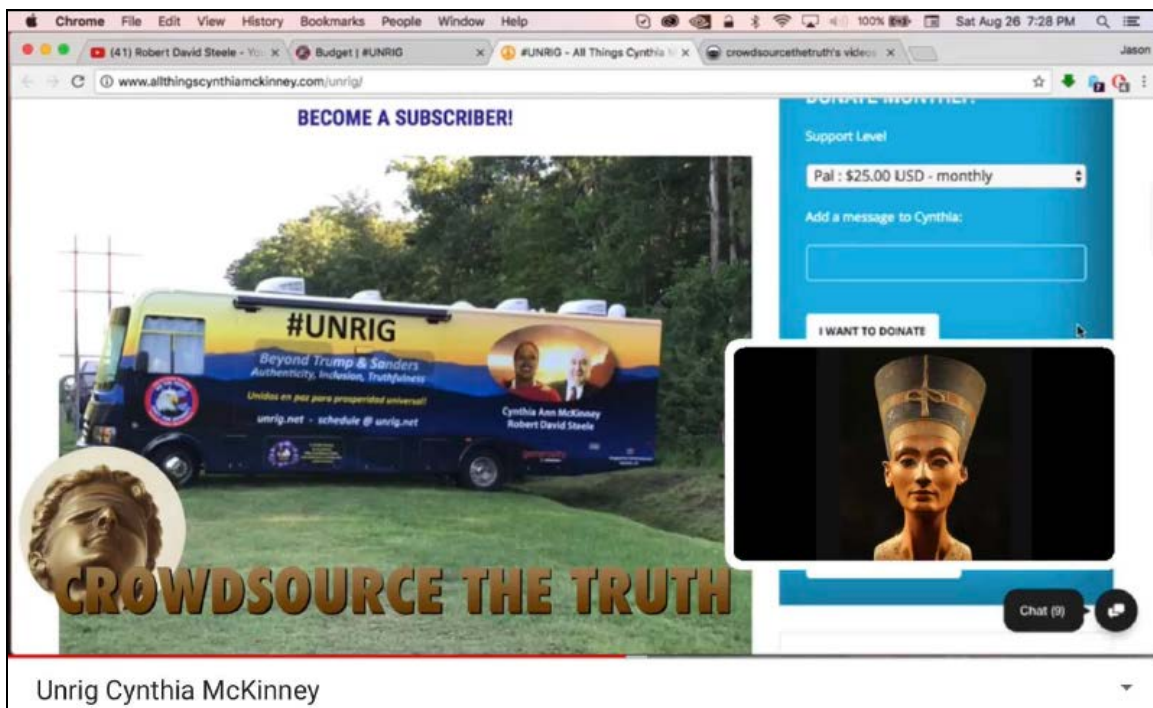
a. Goodman, Negron and Lutzke intentionally set out to destroy Plaintiffs' reputation with falsehoods. The YouTube videos, tweets, retweets and blogs were published in retaliation and reprisal for Robert's decision, following the dirty bomb hoax, to have nothing to do with Goodman or CSTT.

b. Goodman, Negron and Lutzke's statements were knowingly false, with not a shred of supporting evidence. From their constant review of Plaintiffs' websites, Defendants knew that the Plaintiffs fulfilled every commitment made to donors. Every donor to #UNRIG, including Goodman and Lutzke, received a certificate as a Founding Citizen:



Defendants knew and acknowledged in videos that Plaintiffs (a) actively promoted the mission of #UNRIG and communicated with all donors; (b) accounted for every penny spent in a budget that was posted online, <https://www.unrig.net/budget-report/>; (c) honored all requests for refunds of donations; (d) offered a free #UNRIG store and ideas

for do-it-yourself merchandise, such as T-Shirts, posters, bumper stickers, and other items; (e) acquired and professionally wrapped an RV, and began a national tour of the Country in furtherance of the “Summer of Peace” campaign; and (f) published and appeared in multiple video interviews to promote the #UNRIG campaign. Defendants’ own videos, including “UNRIG Cynthia McKinney”, demonstrate that they actively reviewed Plaintiffs’ websites and learned all about the #UNRIG campaign, including Plaintiffs’ use of a professionally-wrapped RV as part of the “Summer of Peace” tour:



The #UNRIG campaign was fully disclosed in all material respects on the website www.unrig.net. Defendants knew that Plaintiffs were engaged in a legitimate full-time effort to unrig the system, “to restore integrity and truth to governance, with the informed will and wisdom of We the People at its heart”, and “to enjoy a transparent government by 2022, that operates with honesty, respecting our planet and the human spirit, so that

we may create a healthy, prosperous America rooted in truth with peace as our shared condition”:



Despite their actual knowledge to the contrary, the Defendants’ published false and defamatory statements that #UNRIG was a “scam” and that Plaintiffs were defrauding and stealing from donors. Defendants also intentionally ignored online evidence, such as General Kernan’s Preface to the NATO Open Source handbook, that proved their statements about Robert were false.

c. Goodman, Negron and Lutzke chose to manufacture and publish false and scandalous statements and use unnecessarily strong and violent language, disproportionate to the occasion. Indeed, in multiple videos the Defendants expressed their clear and convincing feelings of ill-will and animus towards the Plaintiffs.

d. Goodman, Negron and Lutzke did not act in good faith because, in the total absence of evidence, they could not have had an honest belief in the truth of their statements about Plaintiffs.

e. Goodman, Negron and Lutzke reiterated, repeated and continue to republish their false defamatory statements, and enticed others to do so, out of a desire to hurt Plaintiffs and to permanently stigmatize and destroy the Plaintiffs.

38. Goodman, Negron and Lutzke lacked reasonable grounds for any belief in the truth of their statements and acted negligently in failing to determine the true facts.

39. As a direct result of Goodman, Negron and Lutzke's defamation, Plaintiffs each suffered substantial damage and loss, including, but not limited to, presumed damages and actual damages, loss or injury to business, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to reputation, prestige and standing, costs, expenses and out-of-pocket loss in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT II – INSULTING WORDS

40. Plaintiffs restate paragraphs 1 through 39 of this Amended Complaint and incorporate them herein by reference.

41. Goodman, Negron and Lutzke's insulting words, in the context and under the circumstances in which they were produced, published, tweeted, retweeted, written and used, tend to violence and breach of the peace. Like any reasonable person, Robert was humiliated, disgusted, angered and provoked to violence by the insulting words.

42. Goodman, Negron and Lutzke's false and slanderous words are fighting words, which are actionable under § 8.01-45 of the Virginia Code (1950), as amended.

43. As a direct result of Goodman, Negron and Lutzke's insulting words, Plaintiffs suffered damage and loss, including, but not limited to, actual damages, loss or injury to business, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to

reputation, prestige and standing, costs, expenses and out-of-pocket loss in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT III – BUSINESS CONSPIRACY

44. Plaintiffs restate paragraphs 1 through 43 of this Amended Complaint and incorporate them herein by reference.

45. Beginning in June 2017 and continuing through March 23, 2018, Goodman, Negron and Lutzke combined, associated, agreed or acted in concert (a) together and (b) with others, including (i) Creighton, (ii) the operators of multiple YouTube channels and Twitter accounts, and (iii) multiple anonymous agents who have trolled Plaintiffs on the Internet between June 2017 and March 2018, for the express purpose of injuring the Earth Intelligence Network and #UNRIG in its business and reputation through the publication and republication of false and defamatory statements. In furtherance of the conspiracy and preconceived joint plan, Goodman, Negron and Lutzke orchestrated a scheme the unlawful purpose of which was to defame Robert and #UNRIG and destroy their reputations and business. Acting in concert, Goodman, Negron and Lutzke utilized email, text messages, the Internet and various social media properties, including YouTube, Twitter, Facebook, Patreon, GooglePlus and Steemit, to publish, republish and spread the defamation and character assassination.

46. Goodman, Negron and Lutzke acted intentionally, purposefully, without lawful justification, and with the express knowledge that they were injuring the #UNRIG campaign and Earth Intelligence Network.

47. Goodman, Negron and Lutzke's actions constitute a business conspiracy in violation of § 18.2-499 of the Virginia Code (1950), as amended.

48. As a direct result of Goodman, Negron and Lutzke's misconduct, the Earth Intelligence Network suffered damage and loss, including, but not limited to, injury to its business, property loss, injury to its trade and professional reputation, prestige and standing, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$6,000,000.00.

49. In accordance with § 18.2-500 of the Virginia Code, Earth Intelligence Network seeks three-fold the damages by it sustained in a sum to be determined by the Jury, but not less than \$18,000,000.00.

COUNT IV – COMMON LAW CONSPIRACY

50. Plaintiffs restate paragraphs 1 through 49 of this Amended Complaint and incorporates them herein by reference.

51. Goodman, Negron and Lutzke's actions, detailed above, constitute a conspiracy at common law.

52. As a direct result of Goodman, Negron and Lutzke's willful misconduct, Plaintiffs suffered damage and loss, including, but not limited to, injury to business, property loss, injury to professional and personal reputation, prestige and standing, pain and suffering, insult, humiliation and embarrassment, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT V – TORTIOUS INTERFERENCE

53. Plaintiffs restate paragraphs 1 through 52 of this Amended Complaint and incorporate them herein by reference.

54. Earth Intelligence Network had valid and reasonable contracts and business expectancies in its relationships with donors.

55. Goodman, Negron and Lutzke knew about Earth Intelligence Network's contracts and business expectancies. Indeed, some of the donations were made by subscribers/patrons of CSTT.

56. Goodman, Negron and Lutzke intentionally interfered with Earth Intelligence Network's property rights and business expectancies by, *inter alia*, devising, aiding, abetting and actively participating in the scheme to defame and injure Robert and the #UNRIG campaign, by intentionally lying in the YouTube videos and on Twitter and Steemit, by fabricating evidence and claims about Robert, #UNRIG and Dr. McKinney, and by encouraging donors to report "fraud" on the part of Robert and/or #UNRIG. Goodman, Negron and Lutzke's improper methods, actions and practices were, *inter alia*, defamatory, unethical, oppressive, over-reaching, fraudulent, hostile, and sharp.

57. As a direct result of Goodman, Negron and Lutzke's tortious interference with Earth Intelligence Network's contracts and valid business expectations, Earth Intelligence Network has suffered damage and incurred loss, including, without limitation, injury to its property and business, loss of donations, financial loss, damage to reputation, prestige and standing, court costs, and other damages in an amount to be determined by the Jury, but not less than \$6,000,000.

COUNT VI – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

58. Plaintiffs restate paragraphs 1 through 57 of this Amended Complaint and incorporate them herein by reference.

59. Goodman, Negron and Lutzke's conduct, detailed above, was intentional and/or reckless.

60. Goodman, Negron and Lutzke's actions offend against generally accepted standards of decency and morality and constitute gross violations of the terms of service and community guidelines of YouTube, Twitter, and Patreon. Goodman, Negron and Lutzke's actions are atrocious and utterly intolerable.

61. Goodman, Negron and Lutzke's outrageous conduct caused Robert to suffer severe emotion distress, extreme fear and panic.

62. Goodman, Negron and Lutzke's misconduct constitutes intentional infliction of emotional distress.

63. As a direct result of Goodman, Negron and Lutzke's misconduct, Robert suffered damage and incurred loss, including, without limitation, pain and suffering, physical injury, severe emotional trauma, insult, embarrassment, humiliation, public ridicule, anguish, stress and anxiety, injury to reputation, special damages, attorney's fees, costs and out-of-pocket expenses in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT VII – PERSONAL TRESPASS AND COMPUTER HARASSMENT

64. Plaintiffs restate paragraphs 1 through 63 of this Amended Complaint and incorporate them herein by reference.

65. Goodman, Negron and Lutzke have used computers or a computer network to cause physical injury to Robert. Goodman, Negron and Lutzke, with the intent to coerce, intimidate, or harass Plaintiffs, have also used computers or a computer

network to communicate vulgar, profane, and indecent language and to threaten illegal or immoral acts.

66. Goodman, Negron and Lutzke's conduct constitutes personal trespass by computer in violation of § 18.2-152.7 of the Code and computer harassment in violation of § 18.2-152.7:1 of the Code.

67. Robert was injured because of Goodman, Negron and Lutzke's violations of § 18.2-152.7 and § 18.2-152.7:1 of the Code.

68. As a direct result of Goodman, Negron and Lutzke's personal trespass by computer and computer harassment, Robert suffered damage and incurred loss, including, without limitation, pain and suffering, physical injury, severe emotional trauma, insult, embarrassment, humiliation, public ridicule, anguish, stress and anxiety, injury to reputation, special damages, attorney's fees, costs and out-of-pocket expenses in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT VIII – UNAUTHORIZED USE OF NAME AND PICTURE (§ 8.01-40)

69. Plaintiffs restate paragraphs 1 through 68 of this Amended Complaint and incorporate them herein by reference.

70. Between June 2017 and March 23, 2018, Goodman, Negron and Lutzke have used Robert's name and picture on multiple occasions without having first obtained Robert's written consent for advertising purposes and for purposes of trade.

71. Goodman, Negron and Lutzke knowingly used Robert's name and picture in violation of § 8.01-40 of the Virginia Code.

72. Robert suffered damages resulting from Goodman, Negron and Lutzke's unlawful use of his name and picture, including, but not limited to, loss of business and

property, the benefits these Defendants received by using his name and picture, attorney's fees, costs, expenses, and out-of-pocket loss in an amount to be determined by the Jury, but not less than \$6,000,000.00.

COUNT IX – PERMANENT INJUNCTION

73. Plaintiffs restate paragraphs 1 through 72 of this Amended Complaint and incorporate them herein by reference.

74. Goodman, Negron and Lutzke and unlawfully used Robert's name and picture, and they refuse to stop.

75. In accordance with § 8.01-40 and Virginia common law, Robert requests the Court to permanently enjoin and order the Defendants to cease and desist from any further use of Robert's name and/or picture. Robert further requests that the Defendants, and each of them, be enjoined to remove or cause to be removed from the Internet and social media, including YouTube, Twitter, Patreon, and GooglePlus, all videos, tweets, retweets, blogs and posts that contain Robert's name and picture, and to delete any and all Steemit accounts that likewise contain Robert's name or picture.

76. Without Court intervention and an injunction, Robert will suffer actual and irreparable injury to his property interests.

77. There is a substantial likelihood that Robert will succeed on the merits of his claim that Defendants unlawfully used his name and picture, as the Defendants have no right to use or to publish Robert's name and/or picture for advertising purposes or for purposes of trade. Robert does not have an adequate remedy at law.

Plaintiffs allege the foregoing based upon personal knowledge, public statements of others, and records in their possession. Plaintiffs believe that substantial additional evidentiary support, which is in the exclusive possession of the Defendants and their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Plaintiffs reserve the right to amend this Complaint upon discovery of additional instances of the Defendants' defamation and wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request the Court to enter Judgment against the Defendants, jointly and severally, as follows:

- A. Compensatory damages in an amount to be determined by the Jury, but not less than \$6,000,000.00;
- B. Three-fold Damages in accordance with § 18.2-500 of the Virginia Code in the total sum of \$18,000,000.00;
- C. Punitive damages in the amount of \$350,000.00 or the maximum amount allowed by law;
- D. Prejudgment interest at the maximum rate allowed by law from;
- E. Postjudgment interest at the rate of six percent (6%) per annum until paid;
- F. Attorney's Fees and Costs;
- G. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: March 25, 2018

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2018 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendant, Goodman, and to Susan A. Lutzke

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